

Hearing Date and Time: December 19, 2019 at 11:00 a.m.
Objection Deadline: December 12, 2019 at 4:00 p.m.

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Attorneys for Jeffrey Lew Liddle Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
JEFFREY LEW LIDDLE,	: Case No. 19-10747 (SHL)
	:
Debtor	: Jointly Administered with 19-12346 (SHL)
-----	: X

**FIRST APPLICATION OF FOLEY HOAG LLP
FOR INTERIM ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED
AS COUNSEL TO THE DEBTOR AND DEBTOR-IN-POSSESSION
FOR THE PERIOD FROM APRIL 27, 2019 THROUGH OCTOBER 31, 2019**

**SUMMARY SHEET PURSUANT TO
UNITED STATES TRUSTEE GUIDELINES (M-447)**

Name of Applicant:	Foley Hoag LLP
Authorized to Provide Services to:	Debtor and Debtor-in-Possession
Date of Retention:	July 23, 2019, <i>nunc pro tunc</i> to April 27, 2019 [Docket No. 139]
Period for Which Compensation and Expense Reimbursement is Sought:	April 27, 2019 through October 31, 2019
Amount of Interim Compensation Requested (less discounts applied):	\$ 561,953.40
Less 20% Holdback:	\$ N/A

Net of Holdback: \$ N/A

Amount of Interim Expense Reimbursement
Requested: \$ 10,539.41

Total Compensation and
Expense Reimbursement Requested: \$ 572,492.81

Amount of Prior Holdback(s) Sought: \$ N/A

This is a/n: _____ monthly X interim _____ final application.

**SCHEDULE OF FEES FOR THE PERIOD
APRIL 27, 2019 THROUGH OCTOBER 31, 2019**

Employee	Year of Admission	Year Fee Incurred	Hourly Rate	Hours Engaged	Total Value
Partners					
Bauer, Alison D.	1996	2019	\$900.00	180.9	\$162,810.00
Draper, Thomas B.	1980	2019	\$1,035.00	0.6	\$621.00
Gray Jr., William F.	1981	2019	\$925.00	198	\$183,150.00
Licker, Michael	2010	2019	\$715.00	68.1	\$48,691.50
Partner Totals:				447.6	\$395,272.50
Associates					
Fullmer, James S.	2016	2019	\$505.00	302	\$152,510.00
Parkinson, Meredith S.	2011	2019	\$595.00	123.7	\$73,601.50
Teoh, Jiun-Wen Bob	2018	2019	\$470.00	14.3	\$6,721.00
Associate Totals:				440	\$232,832.50
Paralegals					
Kelly, Rachel		2019	\$335.00	74.5	\$24,957.50
Neugebauer, Alison		2019	\$335.00	3.5	\$1,172.50
Nigro, Carla A.		2019	\$335.00	62.9	\$21,071.50
Paralegal Totals:				140.9	\$47,201.50
Litigation Support					
Chourattana, Pai K.		2019	\$295.00	2.1	\$619.50
Leung, Eric		2019	\$295.00	13.1	\$3,864.50
Ming, Emily		2019	\$135.00	0.3	\$40.50
Lit Support Totals:				15.5	\$4,524.50
				1044	\$679,831.00
Total					(117,877.60)
Less Discounts Applied					
Fees					\$561,953.40

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JEFFREY LEW LIDDLE,	:
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Debtor	:
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FOR THE PERIOD FROM APRIL 27, 2019 THROUGH OCTOBER 31, 2019**

TO THE HONORABLE JUDGE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

f in connection with Foley Hoag's representation of the Debtor in the above-captioned chapter 11 case during the period April 27, 2019 through October 31, 2019 (the "First Interim Compensation Period").

In support of the Application, Foley Hoag respectfully represents as follows:

BACKGROUND

1. On March 11, 2019, the Debtor filed a voluntary petition for relief under chapter 11 of Title 11 of the Bankruptcy Code, initiating this Chapter 11 Case.

2. The Debtor continues to operate his business and manage his property as debtor-in-possession pursuant to 11 U.S.C. §§ 1107(a) and 1109 of the Bankruptcy Code. No creditors committee has been appointed.

3. Additional factual background and information regarding the Debtor, including his business operations and the events leading to this Chapter 11 Case, is set forth in Debtor's First Day Declaration [ECF No. 37].

4. On July 23, 2019, the Court approved, effective as of April 27, 2019, the retention of Foley Hoag LLP as counsel to the Debtor [ECF No. 139].

JURISDICTION AND VENUE

5. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.

6. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O).

FEES AND EXPENSES FOR WHICH ALLOWANCE IS SOUGHT

7. On September 4, 2019, the Court entered the Interim Compensation Order. Pursuant to the Interim Compensation Order, retained professionals are authorized, *inter alia*, to submit monthly statements to the Debtor's counsel, counsel to all official committees, if any, creditors who have made an appearance in the instant case, and the United States Trustee for

Region 2 (collectively, the “Notice Parties”), subject to a 20% holdback as to professional fees (the “Holdback”).

8. During the Fee Period, Foley Hoag’s attorneys and paraprofessionals expended a total of 1,169.6 hours for which compensation is requested. The blended hourly rate for Foley Hoag during the Fee Period was \$628.74 for all professionals and \$683.49 for attorneys.

9. Foley Hoag maintains computerized records of the daily time entries completed by all Foley Hoag attorneys and paraprofessionals. Preceding the time entries is a chart listing the names, billing rates, and time spent by each of the attorneys and paraprofessionals rendering services on behalf of the Debtor. In support of the Application and consistent with the Interim Compensation Order, copies of these computerized records, together with a computer-generated detailed itemization of the expenses incurred by Foley Hoag for which reimbursement is sought, have been furnished to the Court and the United States Trustee (and copies have been filed publicly on the docket with the Monthly Fee Statements (defined below)).

10. Pursuant to the terms of the Interim Compensation Order, Foley Hoag has, to date, submitted six monthly statements (collectively, the “Monthly Fee Statements”).

11. On November 6, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period April 27, 2019 through May 31, 2019 on the Notice Parties [ECF No. 222] requesting eighty percent (80%) of its fees, in the amount of \$131,059.92, and one hundred percent (100%) of its expenses, in the amount of \$1,045.54, for a total compensation request in the amount of \$132,105.46.

12. On November 6, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period June 1, 2019 Through June 30, 2019 on the Notice Parties [ECF No. 223] requesting eighty percent (80%) of its fees, in the amount of \$114,396.84, and one hundred

percent (100%) of its expenses, in the amount of \$2,271.18, for a total compensation request in the amount of \$116,668.02.

13. On November 6, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period July 1, 2019 Through July 31, 2019 on the Notice Parties [ECF No. 224] requesting eighty percent (80%) of its fees, in the amount of \$96,774.48, and one hundred percent (100%) of its expenses, in the amount of \$3,207.56, for a total compensation request in the amount of \$99,982.04.

14. On November 6, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period August 1, 2019 Through August 31, 2019 on the Notice Parties [ECF No. 225] requesting eighty percent (80%) of its fees, in the amount of \$50,310.00, and one hundred percent (100%) of its expenses, in the amount of \$1,708.11, for a total compensation request in the amount of \$52,018.11.

15. On November 22, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period September 1, 2019 through September 30, 2019 on the Notice Parties [ECF No. 242] requesting eighty percent (80%) of its fees, in the amount of \$26,136.80, and one hundred percent (100%) of its expenses, in the amount of \$1,430.39, for a total compensation request in the amount of \$27,567.19. Foley Hoag has since determined that the amount set forth in the September Monthly Fee Statement erroneously reflected the total amount of fees as inclusive of a discount of \$3,267.10. Therefore, the total fees requested by the September Monthly Fee Statement should have been \$29,403.90, for a total requested compensation of \$30,834.29.

16. On November 22, 2019, Foley Hoag filed and served the Monthly Fee Statement for the period October 1, 2019 through October 31, 2019 on the Notice Parties [ECF No. 243] requesting eighty percent (80%) of its fees, in the amount of \$33,498.36, and one hundred

percent (100%) of its expenses, in the amount of \$876.63, for a total compensation request in the amount of \$34,374.99.

17. Pursuant to the terms of the Interim Compensation Order, Foley Hoag served a copy of its Monthly Fee Statement, supported by time and disbursement records and a summary of services rendered and expenses incurred, upon each of the Notice Parties (as defined in the Interim Compensation Order) in the format specified by the Guidelines, allowing each of the Notice Parties an opportunity to review and object to the Monthly Fee Statements.

18. During the roughly six-month period covered by the Fee Period, Foley Hoag submitted Monthly Fee Statements for fees aggregating \$561,953.40 and expenses totaling \$10,539.41. In accordance with the Interim Compensation Order, Foley Hoag sought payment of 80% of the fees and 100% of the expenses covered by each Monthly Fee Statement. To date, Foley Hoag has not been paid for its April/May, June, July, August, September, and October Monthly Fee Statements.

19. On November 18, 2019, Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC filed and served an objection to Foley Hoag's Notices of Monthly Fee Statement for the Period from April 27, 2019 through August 31, 2019 [ECF No. 235] (the "Objection"). By the Objection, the Counsel Financial entities objected to the April/May, June, July, and August Monthly Fee Statements, arguing, in part, that payment of Foley Hoag should await confirmation of the filing of an interim fee application.

RELIEF REQUESTED

20. By this Application, Foley Hoag seeks an Order pursuant to sections 330 and 331 of the Bankruptcy Code, awarding Foley Hoag, on an interim basis, compensation for professional services rendered as Debtor's counsel in the amount of \$561,953.40 and reimbursement of

customary and necessary out-of-pocket expenses in the amount of \$10,539.41, for a total award of \$572,492.81.

21. The Monthly Fee Statements submitted by Foley Hoag are subject to the twenty percent (20%) Holdback, as provided for in the Interim Compensation Order. The aggregate amount of the Holdback during the First Interim Compensation Period is \$113,044.10 (the “First Interim Holdback”). To date, Foley Hoag has not been paid any of the compensation or expenses requested by the Monthly Fee Statements. Foley Hoag therefore respectfully requests that the Court authorize the Debtor to pay Foley Hoag 100% of the requested fees and expenses in the amount of \$572,492.81.

22. A summary of the total amount of time spent by each Foley Hoag attorney and paraprofessional for this case during the First Interim Compensation Period is attached hereto and incorporated herein as Exhibit A.

23. A summary of Foley Hoag's expenses incurred during the First Interim Compensation Period, broken down by category, is attached hereto and incorporated herein as Exhibit B.

24. Foley Hoag's contemporaneous time records and expense records for the First Interim Compensation Period, from which the summaries described below were prepared, are attached hereto and incorporated herein as Exhibit C.

SUMMARY OF LEGAL SERVICES RENDERED

25. The following is a summary description of the primary services rendered by Foley Hoag during the Fee Period that highlights the benefits conferred upon the Debtor and its respective estates and creditors. All of the professional services rendered by Foley Hoag are set forth in the computerized time records maintained by Foley Hoag and annexed to the Monthly

Fee Statements, and the Court is respectfully referred to those records for detail of all work performed by the Applicant.

26. Foley Hoag has rendered extensive professional services on behalf of the Debtor during the Fee Period. These Chapter 11 Cases have required thoughtful effort by the attorneys and paraprofessionals of Foley Hoag as the Debtor have encountered numerous legal and logistical challenges. Whenever possible, as demonstrated in the summary of services below, potential disputes have been resolved without resort to the Court.

27. During the Fee Period, Foley Hoag devoted a substantial amount of time rendering legal services to the Debtor, a sampling of which are described below.

28. **Retention Applications.** During the Fee Period, Foley Hoag worked with Torys LLP (“Torys”) to transition the role of Debtor’s counsel from Torys to Foley Hoag. On May 31, 2019, Foley Hoag filed an Application to Employ Foley Hoag LLP as Counsel for the Debtor *Nunc Pro Tunc* to April 27, 2019 [ECF No. 91] and the Court approved that Application at ECF No. 139. Foley Hoag also worked with the Debtor to prepare and file the Application to retain EisnerAmper as the accounting advisor to the firm, which retention was approved at ECF No. 138.

29. **Cash Collateral.** During the Fee Period, Foley Hoag worked to obtain court authority to use Counsel Financial’s purported cash collateral, including preparing a response contesting Counsel Financial’s claim of a security interest in the Debtor’s cash, as asserted in the Memorandum of Law by Counsel Financial II LLC in Support of its Perfected Security Interest in and Lien on Cash Collateral [ECF No. 74]. Foley Hoag’s efforts resulted in the release of over \$1 million of the Debtor’s wife’s property, and confirmed that a similar amount is cash of the estate free of any security interest of Counsel Financial.

30. **Case Administration.** Foley Hoag prepared a motion for entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures, which the Court issued in the Debtor's case on September 4, 2019 [ECF No. 167]. The entry of this order has streamlined and simplified notice and service procedures, leading to significant cost savings for the Debtor's estate. Foley Hoag also filed a motion for the Debtor's Chapter 11 Case to be jointly administered with the subsequently filed chapter 11 case of the Debtor's law firm business, Liddle & Robinson, LLP. The joint administration motion, which was ordered by the court [ECF No. 175], reduced costs and enabled a greater efficiency in the administration of both cases. Foley Hoag also prepared and filed a motion to extend the Debtor's exclusive periods for filing and soliciting votes on a plan of reorganization to January 6, 2020 and March 9, 2020, respectively, which the Court granted [ECF No. 216].

31. **Schedules and Statements.** After filing amended Schedules of Assets and Liabilities and Statements of Financial Affairs [ECF Nos. 56 and 57], Foley Hoag has been working closely with the Debtor to gather information and prepare a new set of amended Schedules and Statements, which will be filed in due course. Foley Hoag also counseled and assisted EisnerAmper with the preparation and filing of the Debtor's monthly operating reports.

32. **Discovery Matters.** During the Fee Period, Foley Hoag assisted the Debtor with filing Rule 2004 Motions to obtain discovery from Counsel Financial Holdings LLC and LIG Capital LLC and the Court entered orders permitting the Debtor to obtain documents and a deposition from each entity. Foley Hoag also counseled the Debtor with respect to production of documents in response to Counsel Financial's Rule 2004 motion and was present at a deposition in connection with the dispute regarding Tara Liddle's ownership of 50 percent of the sale proceeds of their New York co-op.

33. **Stay Relief Matters.** During the Fee Period, Foley Hoag notified courts in which actions against the Debtor were pending, as well as various creditors, of the Debtor's bankruptcy filings and the automatic stay. Foley Hoag also assisted the Debtor with responding to motions and other actions concerning the enforcement of the automatic stay under section 362 of the Bankruptcy Code. As is often the case early in a chapter 11 case, there were a number of matters concerning enforcement of the automatic stay during the Fee Period. Where possible, Foley Hoag worked to resolve such matters consensually. For instance, Foley Hoag has been liaising with counsel to M&T Bank regarding its motion to lift the automatic stay [ECF No. 107] to reach a consensual plan for the marketing and sale of the underlying property. Foley Hoag also assisted the Debtor with obtaining several interim orders extending the automatic stay to Liddle & Robinson, LLP pending the law firm's own voluntary chapter 11 filing [ECF Nos. 71 and 92]. Additionally, VW Credit, Inc., as service for VW Credit Leasing, LTD, filed a Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) & (2) [ECF No.] seeking to lift the automatic stay with respect to an Audi automobile leased to the Debtor. During the Fee Period, Foley Hoag engaged in ongoing negotiations with VW Credit, Inc. regarding a potential consensual resolution.

34. **Claims Administration.** During the Fee Period, Foley Hoag reviewed and analyzed proofs of claim filed against the Debtor.

35. **Miscellaneous Matters.** In addition to the matters discussed above, Foley Hoag rendered services for, or on behalf of, the Debtor in connection with other miscellaneous matters during the Fee Period, such as:

Preparing a response to the Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor's Claims of Exempt Property, Pursuant to

Bankruptcy Rule 4003, and for Related Relief [ECF No. 118], in which Counsel Financial objected both to Debtor's claim of a homestead exemption and Debtor's claim of a household goods exemption. Following the Debtor's response brief, the Counsel Financial entities withdrew their objection to the Debtor's household goods exemption claim. Foley Hoag prepared for and presented argument at a hearing on the remaining objection.

Engaging in the process of perfecting Debtor Jeffrey Lew Liddle's appeal from an adverse judgment in favor of creditor Counsel Financial II, LLC, in New York state court, a judgment which has been integrally related to issues of CF II's status as a creditor in this bankruptcy proceeding. Foley Hoag expects that the appeal will be perfected with an opening brief filed in December 2019.

36. **Services Provided in the Jointly Administered Cases.** A number of the fees recorded in the Debtor's individual case are attributable to services rendered on account of the debtor Liddle & Robinson, L.L.P. in its jointly-administered chapter 11 case. Foley Hoag will work to provide the Court and Counsel Financial with an accurate allocation of fees between the cases.

PROJECT SUMMARY AND SERVICES RENDERED BY FOLEY HOAG

37. A summary of Compensation Requested by Project Category, as required by the UST Guidelines, which sets for the hours and fees billed for each project category listed below, is attached hereto as **Exhibit B.**

(a) **B100-Reporting.** This category includes work on the statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities, and contacts with the United States Trustee not included in other categories. Foley Hoag has expended 4.2 hours, totaling \$2,527.15, in this category.

(b) B110-Case Administration. This category is the “catch-all” for coordination and compliance activities not covered in another category. Among other things, this category includes numerous coordination and compliance matters, including preparation of statements of financial affairs and schedules; preparation of documents for the United States Trustee such as interim statements and operating reports; contacts with the United States Trustee; the initial debtor interview and meeting of creditors with the United States Trustee; addressing general creditor inquiries, and multi-task conferences, both internal and with the Debtor. Foley Hoag has expended 389.9 hours, totaling \$192,549.96, in this category.

(c) B120-Asset Analysis and Recovery. This category includes the identification and review of potential assets including causes of action and non-litigation recoveries. Foley Hoag has expended 0.2 hours, totaling \$127.63, in this category.

(c) B140-Relief from Stay/Adequate Protection Proceedings. This category includes work on matters relating to termination or continuation of the automatic stay under 362 and motions for adequate protection. Foley Hoag has expended 8.8 hours, totaling \$5,540.78, in this category.

(d) B150-Meetings of and Communications with Creditors. This category includes preparing for the 341(a) meeting and communicating with the Debtor’s creditors, as described above and further in Foley Hoag’s time records. Foley Hoag has expended 12.6 hours, totaling \$9,255.15, in this category.

(e) B160-Fee/Employment Applications. This category includes preparation of employment applications for Foley Hoag as counsel to Debtor and EisnerAmper LLP as accountants to Debtor; motions to establish interim procedures for compensation of those

professionals; preparation of budgets and staffing plans; and related work. Foley Hoag has expended 80.66 hours, totaling \$36,284.92, in this category.

(f) B170-Fee/Employment Objections. This category includes review of and objections to the employment and fee applications of others. Foley Hoag has expended 1.5 hours, totaling \$945.15, in this category.

(g) B185-Assumption/Rejection of Leases and Contracts. This category includes analysis of leases and executory contracts, and related activity and advice to the Debtor. Foley Hoag has expended 5.5 hours, totaling \$2,499.75, in this category.

(h) B190-Other Contested Matters (excluding assumption/rejection motions). This category includes analysis and preparation of all other motions, opposition to motions and reply memoranda in support of motions. Foley Hoag has expended 236.9 hours, totaling \$139,194.37, in this category.

(i) B220-Employee Benefits/Pensions. This category includes reviewing, analyzing, and addressing employee-related issues. Foley Hoag has expended 0.2 hours, totaling \$124.18, in this category.

(j) B230-Financing/Cash Collateral. This category includes negotiations, communications, drafting, preparing for and attending cash collateral hearings, and other work on matters under 11 U.S.C. §§ 361, 363, and 364, including cash collateral and secured claims and loan document analysis, all of which are described in more detail above. Foley Hoag has expended 296.8 hours, totaling \$169,874.36, in this category.

(k) B240-Tax Issues. This category includes analysis and advice regarding tax-related issues. To date, Foley Hoag has expended 5.5 hours, totaling \$2,595.67, in this category.

(l) B330-Claims Administration and Objections. This category includes work on specific claim inquiries and analyses, objections and allowances of claims. Foley Hoag has expended 1.3 hours, totaling \$815.98, in this category.

REQUEST FOR INTERIM COMPENSATION

38. Section 331 of the Bankruptcy Code provides for compensation of professionals and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a Court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

39. In determining the amount of reasonable compensation to be awarded to [a] professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

Id. § 330(a)(3).

40. Foley Hoag respectfully submits that the professional services rendered for and on behalf of the Debtor were necessary and reasonable, and serve to preserve and maximize value for the benefit of the Debtor's estate. The compensation requested herein is extremely reasonable in light of the nature, extent, and value of the services rendered to the Debtor.

41. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the problems, issues, and tasks involved. The fees sought by Foley Hoag in this Application are commensurate with fees awarded to Foley Hoag in other cases and the fees charged by comparable law firms. *See In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir. 1977), *reh'g denied*, 547 F.2d 573, *cert. denied*, 431 U.S. 904 (1977).

42. Further, Foley Hoag assigned the work performed in this case to attorneys and paraprofessionals having the experience and specialization to perform the services required efficiently and properly. The attorneys and paraprofessionals providing the services for which compensation is sought, specialize in the fields of debtor and creditor rights, bankruptcy and litigation. Moreover, Foley Hoag, as a general practice, seeks to use the services of paraprofessionals and legal assistants supervised by attorneys whenever appropriate to limit costs and more efficiently utilize the services of attorneys. Foley Hoag has followed this practice with

respect to the services rendered to the Debtor. Finally, in rendering services to and on behalf of the Debtor, Foley Hoag took every care to provide the legal services as efficiently as possible and to avoid duplication of services.

43. In sum, the services rendered by Foley Hoag were necessary and beneficial to the Debtor and the Debtor's estate and were performed in a timely manner commensurate with the complexity, importance, and nature of the issues involved. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

ACTUAL AND NECESSARY EXPENSES INCURRED

44. As set forth in **Exhibit C** hereto, in providing professional services during the First Interim Compensation Period, Foley Hoag has incurred costs and expenses in the amount of \$10,539.41. These expenses are reasonable and necessary and were essential to the overall administration of Foley Hoag's representation as counsel to the Debtor in these Cases.

CUSTOMARY AND COMPARABLE COMPENSATION

45. Pursuant to the Fee Guidelines, Foley Hoag hereby represents that it has not increased any professional fee rates during the pendency of these Cases.

46. The blended hourly rate for Foley Hoag's timekeepers on this Application is \$628.74.

47. The blended hourly rate for Foley Hoag's domestic timekeepers firm-wide is \$597.04.

48. Further, pursuant to the Fee Guidelines, Foley Hoag discloses the following blended hourly rates by category of timekeeper:

Title	Year-to-Date
Partner	\$711.81
Associate	\$452.41
Paralegal	\$290.21
Litigation Support	\$219.13

COMPLIANCE WITH THE FEE GUIDELINES

49. As set forth in the Certification of William F. Gray, Jr., annexed hereto as **Exhibit D**, Foley Hoag believes that this Application is in compliance with Fee Guidelines.

50. No prior application has been made to this or any other Court for the relief requested herein for the First Interim Compensation Period, nor has any payment been received by Foley Hoag on account of the legal services rendered in connection therewith, except as set forth herein. In addition, none of the requested fees and expenses are to be shared by Foley Hoag with any other party, nor are these or any other fees and expenses subject to a sharing agreement between Foley Hoag and any third party.

NOTICE

51. Notice of this Application has been provided to the Notice Parties, in accordance with the Interim Compensation Order. In light of the nature of the relief requested, the Debtor respectfully submits that no further notice is necessary.

NO PRIOR REQUEST

52. Foley Hoag has not previously sought the relief requested herein from this or any other court.

WHEREFORE, Foley Hoag respectfully requests that this Court enter an order:

- (i) approving the allowance, on an interim basis, of compensation for professional services rendered to the Debtor during the First Interim Compensation Period in the amount of \$561,953.40, which represents one-hundred percent (100%) of the total compensation for professional services rendered during the First Interim Compensation Period;
- (ii) approving the allowance, on an interim basis, of the actual and necessary expenses incurred in the amount of \$10,539.41 for the First Interim Compensation Period;
- (iii) authorizing and directing the Debtor to pay Foley Hoag 100% of its requested fees and expenses in the amount of \$572,492.81; and
- (iv) granting such other and further relief as this Court deems just and proper.

Dated: New York, New York
December 5, 2019

FOLEY HOAG LLP

By: /s/ William F. Gray, Jr.

William F. Gray, Jr.

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*Attorneys for Jeffrey Lew Liddle
Debtor and Debtor-in-Possession*

EXHIBIT A

**SUMMARY OF HOURLY FEES FOR THE PERIOD
APRIL 27, 2019 THROUGH OCTOBER 31, 2019**

Foley Hoag LLP
Hours Worked by Timekeeper on Matter 36173.00002

Employee		Hours Engaged	Amount
3152	Bauer, Alison D.	180.9	\$131,041.54
2966	Chourattana, Pai K.	2.1	\$538.96
3046	Draper, Thomas B.	0.6	\$428.42
2653	Fullmer, James S.	302.0	\$128,144.49
3153	Gray Jr., William F.	198.0	\$146,935.04
3218	Kelly, Rachel	74.5	\$22,461.75
2011	Leung, Eric	13.1	\$2,821.04
2187	Licker, Michael	68.1	\$40,201.81
3209	Ming, Emily	0.3	\$36.45
1915	Neugebauer, Alison	3.5	\$1,055.25
1065	Nigro, Carla A.	62.9	\$17,373.58
3116	Parkinson, Meredith S.	123.7	\$64,866.17
3232	Teoh, Jiun-Wen Bob	14.3	\$6,048.90
Grand Total:		1,044.0	\$561,953.40

Foley Hoag LLP
Hours Worked by Task Code and Timekeeper on Matter 36173.00002

Employee		Hours Engaged	Amount
B100.20 Reporting			
3152	Bauer, Alison D.	1.3	\$901.72
2653	Fullmer, James S.	2.9	\$1,243.78
B100.20 Reporting Total:		4.2	\$2,145.50
B100.B110 Case Administration			
3152	Bauer, Alison D.	39.8	\$31,727.43
2966	Chourattana, Pai K.	0.5	\$114.16
2653	Fullmer, James S.	125.1	\$56,104.59
3153	Gray Jr., William F.	36.2	\$28,484.50
3218	Kelly, Rachel	35.0	\$10,552.50
2011	Leung, Eric	1.0	\$265.50
2187	Licker, Michael	15.9	\$10,231.65
3209	Ming, Emily	0.3	\$36.45
1915	Neugebauer, Alison	3.5	\$1,055.25
1065	Nigro, Carla A.	62.9	\$17,373.58
3116	Parkinson, Meredith S.	63.3	\$33,897.15
3232	Teoh, Jiun-Wen Bob	6.4	\$2,707.20
B100.B110 Case Administration Total:		389.9	\$192,549.96
B100.B120 Asset Analysis and Recovery			
3153	Gray Jr., William F.	0.2	\$127.63
B100.B120 Asset Analysis and Recovery Total:		0.2	\$127.63
B100.B140 Relief from Stay/Adequate Protection Proceedings			
3152	Bauer, Alison D.	3.9	\$3,026.63
2653	Fullmer, James S.	0.3	\$136.35
3153	Gray Jr., William F.	0.5	\$416.25
3218	Kelly, Rachel	1.0	\$301.50
3116	Parkinson, Meredith S.	3.1	\$1,660.05
B100.B140 Relief from Stay/Adequate Protection Proceedings Total:		8.8	\$5,540.78
B100.B150 Meetings of and Communications with Creditors			
3152	Bauer, Alison D.	12.0	\$8,869.05
2187	Licker, Michael	0.6	\$386.10
B100.B150 Meetings of and Communications with Creditors Total:		12.6	\$9,255.15
B100.B160 Fee/Employment Applications			
3152	Bauer, Alison D.	13.0	\$9,281.94
2653	Fullmer, James S.	22.8	\$9,842.68
3153	Gray Jr., William F.	1.4	\$1,165.50
3218	Kelly, Rachel	30.1	\$9,075.15
3116	Parkinson, Meredith S.	11.5	\$6,158.25
3232	Teoh, Jiun-Wen Bob	1.8	\$761.40

Employee		Hours Engaged	Amount
B100.B160 Fee/Employment Applications Total:		80.6	\$36,284.92
B100.B170 Fee/Employment Objections			
3152	Bauer, Alison D.	0.7	\$434.63
3153	Gray Jr., William F.	0.8	\$510.52
B100.B170 Fee/Employment Objections Total:		1.5	\$945.15
B100.B185 Assumption/Rejection of Leases and Contracts			
2653	Fullmer, James S.	5.5	\$2,499.75
B100.B185 Assumption/Rejection of Leases and Contracts Total:		5.5	\$2,499.75
B100.B190 Other Contested Matters (excluding assumption/rejection motions)			
3152	Bauer, Alison D.	70.3	\$48,944.06
2966	Chourattana, Pai K.	1.6	\$424.80
2653	Fullmer, James S.	39.3	\$16,482.47
3153	Gray Jr., William F.	51.4	\$38,398.11
3218	Kelly, Rachel	8.4	\$2,532.60
2011	Leung, Eric	12.1	\$2,555.54
2187	Licker, Michael	47.0	\$26,744.14
3116	Parkinson, Meredith S.	2.1	\$1,124.55
3232	Teoh, Jiun-Wen Bob	4.7	\$1,988.10
B100.B190 Other Contested Matters (excluding assumption/rejection motions) Total:		236.9	\$139,194.37
B200.B220 Employee Benefits/Pensions			
3152	Bauer, Alison D.	0.2	\$124.18
B200.B220 Employee Benefits/Pensions Total:		0.2	\$124.18
B200.B230 Finance/Cash Collateral			
3152	Bauer, Alison D.	39.6	\$27,650.90
3046	Draper, Thomas B.	0.6	\$428.42
2653	Fullmer, James S.	103.1	\$40,630.53
3153	Gray Jr., William F.	105.5	\$76,459.07
2187	Licker, Michael	4.6	\$2,839.92
3116	Parkinson, Meredith S.	43.4	\$21,865.52
B200.B230 Finance/Cash Collateral Total:		296.8	\$169,874.36
B200.B240 Tax Issues			
2653	Fullmer, James S.	3.0	\$1,204.34
3153	Gray Jr., William F.	1.1	\$799.13
3232	Teoh, Jiun-Wen Bob	1.4	\$592.20
B200.B240 Tax Issues Total:		5.5	\$2,595.67
B300.B330 Claims Administration and Objections			
3152	Bauer, Alison D.	0.1	\$81.00
3153	Gray Jr., William F.	0.9	\$574.33

Employee		Hours Engaged	Amount
B300.B330 Claims Administration and Objections			
3116	Parkinson, Meredith S.	0.3	\$160.65
B300.B330 Claims Administration and Objections Total:		1.3	\$815.98
Grand Total:		1,044.0	\$561,953.40

EXHIBIT B

**SUMMARY OF EXPENSES FOR THE PERIOD
APRIL 27, 2019 THROUGH OCTOBER 31, 2019**

Foley Hoag LLP
Costs Incurred by Cost Code on Matter 36173.00002

Cost Code		Costs Incurred
200	Air Fare	\$84.30
312	Computer Research, PACER	\$518.60
005X	Conference Call	\$84.65
027	Courier Services	\$327.61
027X	Courier Services	\$34.40
101H	Document Production 1000 or more	\$1,280.50
101G	Document Production 1-999	\$433.20
029	Express Delivery (FEDEX)	\$598.76
029X	Express Delivery (FEDEX)	\$89.61
111	Filing & Recording Fees	\$200.00
204	Hotels & Related Expenses	\$381.03
055	In-House B&W Printing - Outsourced	\$131.28
056	In-House Color Printing - Outsourced	\$51.50
050	In-House Photocopying	\$1,166.16
107	Investigative Services	\$1,000.00
176	Litigation Technology Services	\$1,239.50
206	Meals	\$17.43
206X	Meals	\$56.84
114	Outside Legal Services	\$294.30
113	Outside Professional Fees	\$618.25
028	Postage, including bulk mailings	\$103.65
122	Secretarial Overtime	\$570.00
104	Stenographic Transcripts	\$828.65
101B	Tabs	\$72.40
201	Taxi Fare	\$192.40
001	Telephone	\$39.39
205	Train Fare	\$125.00
Total:		\$10,539.41

EXHIBIT C

**DETAILED TIME AND EXPENSE RECORDS FOR THE PERIOD
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Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
04/29/19	A. Bauer	B230		Review budget with EisnerAmper.	0.1
04/29/19	A. Bauer	B110		Drafting court agenda.	0.1
04/29/19	W. Gray Jr.	B230		Prepare for Court Status conference re extension of automatic stay and contested cash collateral hearings.	3.8
04/29/19	W. Gray Jr.	B190		Work on discovery issues.	1.0
04/30/19	A. Bauer	B190		Calls and e-mails with and to Wander on discovery and depositions and Rule 2004.	1.0
04/30/19	A. Bauer	B110		Review and revision of notice of agenda and proposed second interim order extending stay.	0.5
04/30/19	A. Bauer	B160		Call with client re engagement of accountant and other issues; attention to same.	0.5
04/30/19	A. Bauer	B230		Cash collateral related lien issues and research related thereto; budget issues; prepare for hearing.	5.0
04/30/19	W. Gray Jr.	B330		Review claim by Ethan Brecher regarding description of his proof of claim and objection to schedule assets and liabilities.	0.3
04/30/19	W. Gray Jr.	B110		Review impact of automatic stay and correspond with creditors who are continuing actions against law firm and notifying them of extension of automatic stay; confer with Jeff Liddle regarding the same.	0.3
04/30/19	W. Gray Jr.	B110		Prepare for Court hearing regarding status hearing at court regarding cash collateral issues and discovery issues.	3.8

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04/30/19	W. Gray Jr.	B110	Confer with James Fullmer regarding pre-petition liens on law firm receivables.	1.7
04/30/19	M. Licker	B230	Call with J. Fullmer (.2); review cash collateral motion and order for purposes of drafting adversary proceeding complaint (.6).	0.8
04/30/19	J. Fullmer	B230	Call with M. Licker regarding legal research on cash collateral issue regarding lien perfections.	0.2
04/30/19	J. Fullmer	B230	Legal research regarding cash collateral issue regarding lien perfections (1.8); confer with W. Gray (1.7).	3.5
04/30/19	C. Nigro	B110	Draft and edit amended notice of agenda per A. Bauer (.7); download docket entries in preparation for motion hearing (.7); draft and edit interim order (.6); draft and edit notice of order (.4); file notice and agenda (.4); prepare service mailing labels (.8); email service copies (.2); email word draft to judge's chambers (.1).	3.9
05/01/19	A. Bauer	B230	Call with A. Akinrinade (.5)	0.5
05/01/19	A. Bauer	B190	Prepare for and attend Cash Collateral Hearing and status conference and follow up with client	3.5
05/01/19	A. Bauer	B150	Prepare for with client and attend 341 meeting of creditors and follow up	4.0
05/01/19	W. Gray Jr.	B190	Prepare for and attend Status Conference before Judge Lane regarding motion to extend automatic stay, case status, rule 2004 discovery issues, and claim of Tara Liddle	5.7
05/01/19	M. Licker	B190	Prepare adversary proceeding complaint.	2.4
05/01/19	J. Fullmer	B190	Attention to protective order.	0.4
05/02/19	A. Bauer	B190	Attention to stay order	0.3

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05/02/19	A. Bauer	B160	Attention to ordinary course professionals applications	1.0
05/02/19	A. Bauer	B190	Calls with and emails to and from each of Wander and A. Reiter with W. Gray, and J. Fullmer, and calls with A. Akinrinade and attention to DIP account, cash collateral and budget issues.	7.0
05/02/19	W. Gray Jr.	B190	Review issue of deposit of individual and law firm receipts in single DIP account; work on adversary proceeding	4.3
05/02/19	M. Licker	B190	Prepare adversary proceeding complaint.	0.5
05/02/19	J. Fullmer	B190	Call with A. Bauer and W. Gray regarding litigation issues.	0.6
05/02/19	C. Nigro	B110	Order hearing transcript (.3); update interim order(.3); email order to judge's chambers (.1).	0.7
05/03/19	A. Bauer	B190	Draft letter and attention to distribution of interim stay order to Judge Kalish.	0.5
05/03/19	A. Bauer	B230	Communications with accountant, communications with client and attention to reports and accounts; communications with, to and from counsel to Counsel Financial II.	3.0
05/03/19	W. Gray Jr.	B230	Discussions with D. Wander re segregation of individual and law firm receipts in DIP accounts; review accounting and maintenance of separate records; confer w/Eisner Amper; review redeposit of transferred funds	5.3
05/03/19	C. Nigro	B110	Follow-up regarding hearing transcript (.2); prepare labels for upcoming mailing (.5); review court docket (.1).	0.8

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05/06/19	J. Fullmer	B240	Meeting with W. Gray regarding response to IRS correspondence.	0.2
05/06/19	J. Fullmer	B240	Draft letter in response to IRS claim.	1.3
05/06/19	J. Fullmer	B160	Draft attorney retention applications.	1.4
05/06/19	J. Fullmer	B160	Draft ordinary course professionals application.	1.7
05/06/19	C. Nigro	B110	Prepare creditor mailing of docket entry #71 (.7); call with A. Bauer regarding same (.2); update transcript order of 5/1 hearing per A. Bauer (.3).	1.2
05/07/19	J. Fullmer	B160	Draft ordinary course professionals application.	1.1
05/07/19	J. Fullmer	B160	Draft retention applications.	0.7
05/08/19	A. Bauer	B230	Call with Akinrinade (.5); communications with various counsel on cash collateral issues (.1).	0.6
05/08/19	A. Bauer	B160	Communications with tax and benefits professionals (.3); drafting of ordinary course applications (1.3).	1.6
05/08/19	A. Bauer	B190	Attention to protective order.	0.4
05/08/19	W. Gray Jr.	B190	Work on discovery issues; review Tara Liddle's claim in Sale Proceeds; confer w/JLL re accounting, cash collateral, and monthly operating reports	4.3
05/08/19	M. Licker	B190	Review draft protective order.	1.0
05/08/19	J. Fullmer	B190	Draft proposed protective order.	1.3
05/09/19	A. Bauer	B110	Review and revise protective order (.4); attention to proof of claims filed (.1).	0.5
05/09/19	A. Bauer	B230	Call with A. Akinrinade regarding accounts.	0.7

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05/09/19	A. Bauer	B160	Review and revise retention applications (.7); attention to ordinary course professionals application including communications with professionals (.8).	1.5
05/09/19	W. Gray Jr.	B230	Research re issues of equitable estoppel; confer with accountants re preparation of filings; work on lien review and issues re cash collateral	3.3
05/09/19	M. Licker	B190	Call with J. Fullmer (.3); review and revise draft protective order (.3).	0.6
05/09/19	J. Fullmer	B190	Call with M. Licker regarding proposed protective order.	0.3
05/09/19	J. Fullmer	B190	Draft proposed protective order.	1.9
05/09/19	C. Nigro	B110	Compile list of creditors on schedules E, F & G not on creditor matrix (.8); review pacer docket for creditor matrix (.2).	1.0
05/10/19	A. Bauer	B110	Attention to creditors matrix and communications with C. Nigro regarding same.	0.3
05/10/19	A. Bauer	B160	Attention to Foley Hoag retention and benefit/accountant ordinary course professionals retention pleadings.	0.5
05/10/19	A. Bauer	B230	Attention to budget issues.	0.3
05/10/19	A. Bauer	B230	Call with A. Akinrinade regarding accounting issues.	0.5
05/10/19	A. Bauer	B110	Attention to inquires re assets and to pleadings filed	0.2
05/10/19	W. Gray Jr.	B230	Work on memo of law regarding perfection of lien and cash collateral issues; confer with Alison Bauer regarding the same; UCC research of perfection of interest in deposit accounts	3.8

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05/10/19	C. Nigro	B110	Update docket entries (.2); review bankruptcy rules regarding adding creditors (.3); call clerk regarding updating creditor matrix (.2); create text file of new creditors (.6); file creditors to update matrix (.2).	1.5
05/11/19	W. Gray Jr.	B230	Review Counsel Financial memo in support of perfection of lien; outline response; review cited cases	1.6
05/12/19	A. Bauer	B230	Review CF II response and research regarding same.	1.0
05/12/19	J. Fullmer	B230	Attention to cash collateral brief and reply.	1.0
05/13/19	A. Bauer	B230	Calls with and emails to and from U.S. Trustee and W. Gray on DIP account; call with A. Akinrinade (.5); call with Debtor and W. Gray (.4); communications with T. Liddle counsel and CF counsel on cash collateral issues (.3); attention to cash collateral brief and reply issues (2.0); emails re budget amounts (.2)	3.4
05/13/19	A. Bauer	B150	Call with U.S. Trustee on 341 meeting and emails to U. S Trustee office (.3); follow up on and review of draft of notice of adjournment (.2).	0.5
05/13/19	A. Bauer	B230	Conference with Gray (.3); conference Gray and Fullmer (1.0)	1.3
05/13/19	W. Gray Jr.	B230	Work on opposition memorandum regarding lien perfection (2.8); call with Alison Bauer and James Fullmer (1.0).	3.8
05/13/19	W. Gray Jr.	B110	Confer w/US Trustee re reporting issues and discovery issues; confer regarding monthly operating reports with accountants	1.3

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05/13/19	J. Fullmer	B230	Call with A. Bauer and W. Gray regarding cash collateral brief.	1.0
05/13/19	J. Fullmer	B230	Legal research on cash collateral issues.	4.7
05/13/19	J. Fullmer	B230	E-mails to and from A. Bauer and W. Gray on cash collateral brief research.	1.4
05/13/19	C. Nigro	B110	Prepare package to be sent to A. Schwartz (.3); draft notice of adjournment of creditors with certificate or service (.6); call Judge Lane's chambers regarding adjournment process (.3); draft certificate of service (.3).	1.5
05/14/19	A. Bauer	B230	Call with J. Nadkarni (UST), W. Gray and A. Akinrinade re accounts (.8); review of and follow up on draft Monthly operating report (.3); analysis of cash collateral related issues (.6).	1.7
05/14/19	A. Bauer	B140	Review of VW relief from stay motion.	0.3
05/14/19	A. Bauer	B190	Attention to Rule 2004 Motions, call with M. Licker and attention to correspondence amongst parties including counsel to Counsel Financial II and Tara Liddle and setting up court call.	1.0
05/14/19	W. Gray Jr.	B190	Work on memorandum of law in opposition to Counsel Financial's claim of lien against Sale Proceeds	3.5
05/14/19	W. Gray Jr.	B240	Conference w/IRS regarding extension of time to file tax returns	0.3
05/14/19	M. Licker	B190	Telephone conference with A. Bauer regarding production of documents in response to 2004 exam motion (0.1); review CF II 2004 exam motion papers (0.4).	0.5

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05/14/19	J. Fullmer	B230	Legal research on cash collateral issues.	2.9
05/14/19	C. Nigro	B110	File Notice of Adjournment of meeting of creditor and certificate of services (.3); register A. Bauer and W. Gray with court call (.4); prepare mailing to all creditors (.8); process hearing transcript (.2); calendar 341 meeting (.1); review 8th interim cash collateral budget per A. Bauer (.4); download, combine and circulate motion for relief (.3); calendar vw motion (.1); calendar cash collateral motion (.1).	2.7
05/15/19	A. Bauer	B190	Internal communications in preparation for and following up on call on Rule 2004 discovery with M. Wander (.7); call with M. Wander and M. Licker (.8); communications with client (.1); attention to emails re same (.2)	1.8
05/15/19	A. Bauer	20	Calls with A. Akinrinade re budget and MOR and follow up re same (.7); emails to Trustee (.1).	0.8
05/15/19	W. Gray Jr.	B230	Conference call with James Fullmer to review memo of law arguments regarding perfection of security interest in Sale Proceeds and Escrow Account.	1.5
05/15/19	W. Gray Jr.	B190	Work on protective order; work on discovery schedule	1.3
05/15/19	W. Gray Jr.	B120	Work on Glaxo issue relating to payment of mediator	0.2
05/15/19	M. Licker	B190	Telephone conference with A. Bauer regarding production of documents (0.2); telephone conference with A. Bauer and opposing counsel regarding production of documents (0.8); prepare for same (0.1).	1.1

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05/15/19	J. Fullmer	B230	Legal research regarding cash collateral issues.	0.6
05/15/19	J. Fullmer	B230	Draft outline of cash collateral brief.	0.3
05/15/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral brief.	1.5
05/15/19	J. Fullmer	20	File and serve monthly operating report.	0.5
05/15/19	J. Fullmer	20	Call with A. Bauer regarding monthly operating report.	0.2
05/16/19	A. Bauer	B160	Attention to establishing fee application guidelines.	0.3
05/16/19	A. Bauer	B190	Prepare for and attend telephonic court conference with A. Reiter, D. Wander, W. Gray and A. Schwartz and follow up communications re same and analysis of precedents (2.0); communications with M. Licker and J. Fullmer (.4); call with Licker (.2); edited draft complaint (.5)	3.1
05/16/19	A. Bauer	B110	Attention to service and filing issues	0.3
05/16/19	T. Draper	B230	Call J. Fullmer regarding escrow account UCC questions; review W. Gray memo and UCC.	0.6
05/16/19	W. Gray Jr.	B230	Work on opposition memorandum re Counsel Financial's perfection of lien on Sale Proceeds (5.0); call with James Fullmer re cash collateral (.3).	5.3
05/16/19	W. Gray Jr.	B110	Attend court call conference before Judge Lane regarding discovery issues for Tara Liddle's disposition of Sale Proceeds and other issues	1.2
05/16/19	M. Licker	B190	Telephone conference with W. Gray regarding cash collateral motion (0.2); review outline regarding reply brief for same (0.2).	0.3

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05/16/19	M. Licker	B190	Review proposed CF II document search terms (0.2); telephone conference with A. Bauer regarding email review in response to motion for 2004 exam (0.1); prepare email response to CF II regarding proposed search terms (0.4).	0.7
05/16/19	M. Licker	B190	Telephone conferences with J. Liddle regarding proposed discovery and protective order.	2.5
05/16/19	J. Fullmer	B230	Call with W. Gray regarding legal research on cash collateral issues.	0.3
05/16/19	J. Fullmer	B230	Call with T. Draper regarding legal research on cash collateral issues.	0.4
05/16/19	J. Fullmer	B230	Draft outline of brief objecting to Counsel Financial's lien on Sale Proceeds.	6.1
05/16/19	C. Nigro	B110	Draft and file certificate of service for monthly operating report (.3); prepare creditor matrix mailing (.7).	1.0
05/17/19	A. Bauer	B230	Emails from and to David Wander, J. Hubbard, W. Gray regarding arbitrator payments and discussions with client and discussions with Gray; (.3) emails to and from Licker and Fullmer and Gray re Counsel Financial II (.3); call with Liddle and Gray (1.0)	1.6
05/17/19	A. Bauer	B160	Emails to and from C. Caparelli on Torys retention and A. Schwartz re same	0.1
05/17/19	W. Gray Jr.	B230	Call with Alison Bauer and James Fullmer (.2); Work on opposition memorandum re perfection of lien; confer w/client re same (1.1).	1.3
05/17/19	M. Licker	B190	Review and revise proposed protective order and send to CF II counsel and trustee.	0.4

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05/17/19	J. Fullmer	B230	Confer with A. Reiter regarding cash collateral issue lien perfection issue.	0.4
05/17/19	J. Fullmer	B230	Call with W. Gray and A. Bauer regarding cash collateral issues.	0.2
05/17/19	J. Fullmer	B230	Legal research on cash collateral issues.	4.4
05/18/19	W. Gray Jr.	B230	Work on memorandum in opposition to lien perfection; confer w/James Fullmer regarding the same	2.2
05/18/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral brief.	0.6
05/18/19	J. Fullmer	B230	Edit cash collateral brief regarding lien perfection.	0.7
05/19/19	J. Fullmer	B230	Draft cash collateral brief regarding lien perfection.	6.4
05/20/19	A. Bauer	B230	Call with A. Akinrinade, W. Gray (.1); call with A. Akinrinade, W. Gray and J. Liddle (.5); call with A. Akinrinade (.1); communications with client on expenses and analysis of same (.4)	1.1
05/20/19	A. Bauer	B190	Attention to and drafting related to litigation over sale proceeds (3.0); internal emails with Foley Hoag team (.5)	3.5
05/20/19	A. Bauer	B220	Communications re pension plan (.2)	0.2
05/20/19	A. Bauer	B160	Communications with Ordinary Course professionals (.2); email to debtor(.1)	0.3
05/20/19	W. Gray Jr.	B230	Work on memo of law in opposition to lien arguments by Counsel Financial (4.2); calls with Alison Bauer, James Fullmer, and Akinrinade (.5).	4.7
05/20/19	W. Gray Jr.	B110	Consider removal of cases	0.2

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05/20/19	M. Licker	B190	Telephone conference with CF II counsel regarding document production and protective order.	0.7
05/20/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral brief and regarding lien perfection.	0.1
05/20/19	J. Fullmer	B110	Draft proposed case management order.	1.3
05/20/19	J. Fullmer	B230	Draft cash collateral brief regarding lien perfection.	2.2
05/20/19	C. Nigro	B110	Call with A. Bauer regarding claims agents (.2); call with multiple claims agents regarding proposal (.9); create analysis of proposals (.8); update creditor matrix (.2).	2.1
05/21/19	A. Bauer	B190	Composed email to David Wander (Davidoff Hutcher & Citron LLP), areiter@reiterlawfirm.com, Michael Wexelbaum, LKH@dhclegal.com, mdk@dhclegal.com: Re: Request for Consent (.1); internal calls (.5); internal emails (.5); draft comments and discuss (2.2).	3.3
05/21/19	A. Bauer	B230	Emails with EisnerAmper and internal re April billings (.2).	0.2
05/21/19	A. Bauer	B110	Emails with Nigro re Creditor Matrix (.2).	0.2
05/21/19	W. Gray Jr.	B230	Work w/James Fullmer on memo in opposition to Counsel Financial lien position; review w/client	3.6
05/21/19	W. Gray Jr.	B230	Review effect of perfection issues on Tara Liddle proceeds as property of the estate; confer w/Arnie Reiter regarding the same	1.2
05/21/19	W. Gray Jr.	B190	Work on protective order; confer w/Alison Bauer and Mike Licker	0.4

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05/21/19	M. Licker	B190	Telephone conference with e-discovery vendor regarding cell phone collection (0.4); telephone conference with W. Gray and A. Bauer regarding document collection and protective order (0.4).	0.8
05/21/19	J. Fullmer	B230	Draft cash collateral brief regarding lien perfection.	3.4
05/21/19	J. Fullmer	B230	Calls with W. Gray regarding cash collateral brief regarding lien perfection.	0.2
05/21/19	C. Nigro	B110	Update case calendar per A. Bauer (.2); review and compile claims agent quotes per A. Bauer (.9); draft Certificate of Service of Rule 2001 parties (.5); review mailing list of creditors for completeness (.4); update spreadsheet (.2).	2.2
05/21/19	E. Leung	B190	Phone communication with M. Licker and client regarding data collection, including send client PST creation guide, and communication with vendor regarding data collection.	0.9
05/22/19	A. Bauer	B190	Various Conferences with Gray (.4); attention to draft pleadings and communications on comments thereto (2.0); calls with M. Licker (.4); attention to protective order, discovery and other issues (.3); communications re filings and service (.1).	3.2
05/22/19	A. Bauer	B110	Attention to docket, orders entered and pleadings filed; attention to MOR filing	0.2
05/22/19	A. Bauer	B170	Attention to additional conflicts reports and drafting of retention application and affidavit.	0.7

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05/22/19	W. Gray Jr.	B230	Confer with James Fullmer and work on memo in opposition to Counsel Financial lien position re Sale proceeds.	4.6
05/22/19	W. Gray Jr.	B240	Confer w/Mike Scotto at IRS re filing deadlines for tax returns	0.3
05/22/19	M. Licker	B190	Telephone conference with J. Liddle regarding revisions to protective order (1.0); telephone conferences with A. Bauer and J. Fullmer regarding collection of J. Liddle text messages and motion for protective order (0.4).	1.4
05/22/19	J. Fullmer	B230	Finalize and file cash collateral brief regarding lien perfection.	4.2
05/22/19	J. Fullmer	B190	Call with M. Licker regarding protective order.	0.1
05/22/19	J. Fullmer	B230	Calls with W. Gray regarding cash collateral brief regarding lien perfection.	0.5
05/22/19	J. Fullmer	B190	Legal research on protective order.	0.4
05/22/19	J. Fullmer	B190	Review issue regarding lien perfection.	2.7
05/22/19	E. Leung	B190	Communication with vendors HaystackID, CohnReznick, Transperfect, and DFR Forensics regarding Blackberry data collection.	0.7
05/22/19	E. Leung	B190	Communication with vendors and M. Licker regarding Blackberry text message collection.	1.3
05/22/19	E. Leung	B190	Communication with Helpdesk, vendor, and M. Licker regarding Blackberry text message collection.	0.5

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05/23/19	A. Bauer	B190	Revision of litigation papers and conferences with James Fullmer 2.5; call with Licker (0.2); communications with C. Nigro on service and filings (.1); communications with D. Wander (.1) attention to facts re CF (.4); internal team emails (.5).	3.8
05/23/19	A. Bauer	B160	Revision to retention applications	0.3
05/23/19	A. Bauer	B140	Attention to facts and law related to VW motion	0.4
05/23/19	M. Licker	B190	Telephone conference with IT vendor regarding collection of J. Liddle cell phone for document production (0.3); review legal research regarding protective orders in law firm bankruptcies (0.2); emails to A. Bauer and W. Gray regarding discovery and protective order status (0.3); review J. Liddle emails for production to CF II (0.3).	1.1
05/23/19	J. Fullmer	B190	Review issue regarding lien perfection.	1.4
05/23/19	J. Fullmer	B190	Legal research on protective order issue.	2.5
05/23/19	J. Fullmer	B190	Calls with A. Bauer regarding lease issue.	0.4
05/23/19	C. Nigro	B110	File and serve Monthly Operating Report (.5); create calendar entries per A. Bauer (.2); order transcripts for 3/28 hearing (.2).	0.9
05/23/19	E. Leung	B190	Communication with M. Licker regarding email data collection.	0.1
05/23/19	E. Leung	B190	Process data collection and transfer with client.	1.2
05/23/19	E. Leung	B190	Conference call regarding Blackberry data collection.	0.4

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05/24/19	A. Bauer	B110	Attention to creditor related service issues; attention to vw issues.	0.4
05/24/19	A. Bauer	B190	Various communications with internal team on discovery related issues (.3); attention to correspondence to and from D. Wander(.3); attention to protective order (.2); review of Tara Liddle papers(.5); call with A. Schwartz and then with A. Schwartz and M. Licker (.5).	1.8
05/24/19	M. Licker	B190	Telephone conference with A. Schwartz and A. Bauer regarding protective order (0.3); follow-up telephone conference with A. Bauer regarding protective order (0.2); telephone conference with counsel for CF II regarding discovery status and follow-up email regarding same (0.4); review J. Liddle emails for production to CF II (0.7).	1.6
05/24/19	J. Fullmer	B190	Telephone call with A. Reiter.	0.2
05/24/19	C. Nigro	B110	Update creditor matrix (.2); call clerk regarding removing address from matrix (.2); draft letter to clerk regarding change of creditor address (.4); forward Volkswagen Notice of Appearance to A. Bauer (.1); draft and file Monthly Operating Report Certificate of Service (.3); email Q. von Bonin all docket filings per A. Bauer (.3); copy Torys files to Q drive (.4).	1.9
05/24/19	E. Leung	B190	Process PST data and load into Relativity, including build family relationships, populate DateTimeSort, hidden content analysis, image and OCR, build dtSearch index, build Terms search.	2.6

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05/24/19	E. Leung	B190	Communication with client, vendor regarding data collection, transferal of PST email archive file.	0.6
05/26/19	A. Bauer	B190	Emails to and from Licker and Gray	0.2
05/27/19	J. Fullmer	B110	Draft proposed case management order.	1.6
05/27/19	J. Fullmer	B230	Legal research regarding lease issue.	0.9
05/28/19	A. Bauer	B190	Internal emails(.1); call with Fullmer, Licker and Gray (.8); meeting with Liddle and Gray and call with T. Kavaleron on causes of action (1.0); attention to debt documents re litigation (.2); research re litigation financing(1.0)	3.1
05/28/19	A. Bauer	B230	Call with A. Akinrinade and attention to budget issues	0.2
05/28/19	A. Bauer	B160	Revision of affidavit regarding retention application.	0.2
05/28/19	W. Gray Jr.	B230	Review lien perfection issues under the UCC (2.2), phone call with Meredith Parkinson and James Fullmer re same (.6).	2.8
05/28/19	W. Gray Jr.	B330	Confer with Ron of Long Island Wine Storage; review claims filings	0.6
05/28/19	W. Gray Jr.	B190	Work on protective order with J. Fullmer, A. Bauer and M. Licker.	1.1
05/28/19	M. Licker	B190	Telephone conference with W. Gray, A. Bauer and J. Fullmer regarding case strategy and discovery status.	0.8
05/28/19	J. Fullmer	B190	Call with A. Bauer, W. Gray, and M. Licker regarding litigation issues.	0.8
05/28/19	J. Fullmer	B230	Call with W. Gray and M. Parkinson regarding legal research on cash collateral issue.	0.6

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05/28/19	J. Fullmer	B110	Draft proposed case management order.	2.1
05/28/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	0.7
05/28/19	M. Parkinson	B230	Call with W. Gray and J. Fullmer re cash collateral research issues on Lien Perfection issues (.6); review background materials on case and security interest from A. Bauer (1.2); review research of J. Fullmer on 552(b) (1.2); begin researching security interests in legal fee contracts and extent of security interest in postpetition accounts receivable (1.9).	4.9
05/28/19	C. Nigro	B110	Create Q drive folder for T. Liddle Adversary case docket items (.3); review Claims Agent quotes (.4); process and circulate hearing transcript (.2); update claims mailing list (.3).	1.2
05/28/19	E. Leung	B190	Review Relativity Mobile Data workspace view setup, including consult with HaystackID.	0.4
05/29/19	A. Bauer	B190	Attention to and emails regarding hearing agenda, protective order, document production	1.1
05/29/19	A. Bauer	B230	Attention to budget and cash collateral order (.4)	0.4
05/29/19	W. Gray Jr.	B230	Work on Counsel Financial lien analysis, including impact of Liddle & Robinson filing	2.3
05/29/19	W. Gray Jr.	B190	Call with Michael Licker and confer with potential special litigation counsel re contemplated adversary proceeding.	1.0
05/29/19	M. Licker	B190	Prepare letter to court regarding entry of protective order.	0.9

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05/29/19	M. Licker	B190	Review emails related to Tara Liddle issue for production to Counsel Financial (1.7); telephone conference with E. Leung regarding production of emails to Counsel Financial (0.2); telephone conference with W. Gray regarding production of emails and text messages to Counsel Financial (0.2); review text messages related to Tara Liddle issue for production to Counsel Financial (0.9).	3.0
05/29/19	J. Fullmer	B230	Legal research on cash collateral issue re UCC perfection issues.	1.4
05/29/19	J. Fullmer	B110	Draft proposed case management order.	0.8
05/29/19	J. Fullmer	B110	Draft agenda for June 4 hearing.	1.3
05/29/19	M. Parkinson	B230	Further research re 552(b) and postpetition accounts receivable; research perfection of security interest in accounts receivable; discuss same with J. Fullmer and draft summary of research.	4.8
05/29/19	P. Chourattana	B110	Review and quality check production.	0.3
05/29/19	E. Leung	B190	Review Mobile Data results.	0.4
05/29/19	E. Leung	B190	Process 34 documents in connection with JLL0000001 production, including imaging, endorse, export (1.3); call with M. Licker re same (.2).	1.5
05/30/19	A. Bauer	B230	Amended budget issues and emails with and to accountant and team(.2);	0.2
05/30/19	A. Bauer	B190	Various emails re discovery, document production and privilege issues (.4); attention to agenda and drafting of orders (.3)	0.7

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05/30/19	W. Gray Jr.	B230	Work on cash collateral budgets with James Fullmer and Meredith Parkinson; review lien claims by Counsel Financial, including UCC claims.	3.8
05/30/19	W. Gray Jr.	B230	Confer with client and Michael Licker regarding his document production regarding Tara Liddle adversary proceeding.	0.8
05/30/19	W. Gray Jr.	B170	Work on retention papers related to Foley Hoag.	0.8
05/30/19	M. Licker	B190	Review text messages regarding Tara Liddle issue for production to Counsel Financial (1.6); telephone conference with J. Liddle and W. Gray regarding Tara Liddle document production (0.8); email to counsel for Counsel Financial regarding Tara Liddle document production (0.2).	2.6
05/30/19	J. Fullmer	B230	Call with W. Gray and M. Parkinson regarding legal research on cash collateral issue.	0.6
05/30/19	J. Fullmer	B230	Legal research regarding cash collateral issue regarding lien perfection.	0.2
05/30/19	J. Fullmer	B230	Draft notices and other papers to be filed with court.	2.4
05/30/19	M. Parkinson	B230	Further research re perfection of security interest in accounts receivable; prepare for call with W. Gray and J. Fullmer re 552(b) research; call to discuss extent of security interest in postpetition accounts receivable.	1.3
05/31/19	A. Bauer	B190	Review and revise various notices and orders including automatic stay extension, budget, agenda, engagement and numerous internal communications re same (2.5); call with W. Kozeny of VW (.5).	3.0

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05/31/19	A. Bauer	B160	Follow up on retention applications	0.3
05/31/19	A. Bauer	B230	Prepare for next hearing and confer with W. Gray (.2); call with J. Fullmer (1.4).	1.6
05/31/19	W. Gray Jr.	B230	Research and review Counsel Financial lien collateral position; review budgets (2.7); telephone call with James Fullmer regarding same (.1).	2.8
05/31/19	M. Licker	B190	Emails to counsel for Counsel Financial regarding Tara Liddle document production (0.2); telephone conference with W. Gray regarding proposed protective order (0.2).	0.4
05/31/19	J. Fullmer	B230	Calls with A. Bauer regarding filings.	1.4
05/31/19	J. Fullmer	B230	Finalize and file court papers.	2.9
05/31/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	0.3
05/31/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.1
Less Discount Applied				(49,894.50)
TOTALS				329.1

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**Costs Incurred by Cost Code and Timekeeper on 36173.00002
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Employee		Costs Billed
001 Telephone		
2011	Leung, Eric	\$7.93
2187	Licker, Michael	\$31.46
001 Telephone Total:		\$39.39
029X Express Delivery (FEDEX)		
3153	Gray Jr., William F.	\$22.14
029X Express Delivery (FEDEX) Total:		\$22.14
055 In-House B&W Printing - Outsourced		
3152	Bauer, Alison D.	\$6.72
055 In-House B&W Printing - Outsourced Total:		\$6.72
101G Document Production 1-999		
1674	Porrata, Cynthia E.	\$93.84
101G Document Production 1-999 Total:		\$93.84
101H Document Production 1000 or more		
1674	Porrata, Cynthia E.	\$147.70
101H Document Production 1000 or more Total:		\$147.70
113 Outside Professional Fees		
3152	Bauer, Alison D.	\$441.45
113 Outside Professional Fees Total:		\$441.45
114 Outside Legal Services		
3153	Gray Jr., William F.	\$294.30
114 Outside Legal Services Total:		\$294.30
Grand Total:		\$1,045.54

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Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours	Amount
06/02/19	W. Gray Jr.	B190		Review pleadings regarding Tara Liddle Adversary proceedings	0.8	740.00
06/03/19	A. Bauer	B110		Prepare for hearing and review of documents needed for hearing, confer with Gray (2.0); confer with Fulmer on service and case management order (.2); confer with C. Nigro (.1); draft work in progress report (.4).	2.7	2,430.00
06/03/19	A. Bauer	B190		Attention to Emails to and from D. Wander and M. Wexelbaum on inspections and other litigation and Rule 2004 matters (.4); emails to and from client (.1).	0.5	450.00
06/03/19	A. Bauer	B230		Call with A. Akinrinade and W. Gray on budget (.2); comments to and from Wander on budget (.1); items (.2); revisions to budget (.1).	0.6	540.00
06/03/19	A. Bauer	B160		Attention to revision to EA retention order and communications with Fullmer and Akinrinade re same.	0.4	360.00
06/03/19	A. Bauer	B190		Call with D. Wander on Rule 2004 inspections (.2) and follow up internally with paralegal (.1).	0.3	270.00

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06/03/19	W. Gray Jr.	B230	Review monthly operating reports and budget with EisnerAmper; call with James Fullmer and work on cash collateral motion in preparation of court hearing on June 4th.	1.7	1,572.50
06/03/19	W. Gray Jr.	B190	Work on discovery issues including conference call with Michael Licker regarding protective order.	1.2	1,110.00
06/03/19	M. Licker	B190	Telephone conference with W. Gray regarding protective order (0.3); email to A. Bauer and W. Gray protective order (0.1); legal research regarding filing motions under seal (0.3); telephone conference with J. Liddle regarding protective order (1.0); follow-up call with W. Gray regarding protective order (0.1).	1.8	1,287.00
06/03/19	M. Licker	B190	Review emails for production to CF II.	0.5	357.50
06/03/19	M. Licker	B190	Telephone conference with CF II regarding T. Liddle discovery status (0.4) and follow-up email to W. Gray regarding same (0.2).	0.6	429.00
06/03/19	J. Fullmer	B160	Calls with A. Bauer regarding retention issues.	0.3	151.50
06/03/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	0.3	151.50
06/03/19	J. Fullmer	B160	Draft papers regarding retention.	2.6	1,313.00

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06/03/19	J. Fullmer	B110	Draft proposed case management order.	0.8	404.00
06/03/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issues.	0.2	101.00
06/03/19	C. Nigro	B110	Update internal docket (.2); draft and file certificate of service (.4); prepare service mailing (.6); draft schedule of properties for inspections (.6).	1.8	603.00
06/04/19	A. Bauer	B190	Prepare for, travel to and from and participate in court hearing and discussions with creditors' counsel (2.5.); attention to drafting of and revisions to court orders (1.0); call with debtor and W. Gray (.4) ; numerous emails between D. Wander, A. Reiter, R. White and debtor's counsel (.6); attention to CFII reply Memorandum (.4); email to W. Kozeny re adjournment of Audi contested matter (.1); emails re inspection and other discovery requests (.2); call with M. Licker (.3); communications with Kasowitz firm (.2).	5.7	5,130.00

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06/04/19	W. Gray Jr.	B190	Prepare for and attend hearing regarding cash collateral issues, relief from the automatic stay and general budgeting issues, and discovery issues; confer with Alison Bauer regarding the same (1.9); Call with Michael Licker regarding discovery issues (.1).	2.0	1,850.00
06/04/19	M. Licker	B190	Telephone conference with W. Gray regarding discovery issues in preparation for hearing.	0.1	71.50
06/04/19	J. Fullmer	B230	Call with A. Bauer regarding revisions to proposed orders.	0.1	50.50
06/04/19	J. Fullmer	B190	Draft revised proposed order on automatic stay.	0.6	303.00
06/04/19	J. Fullmer	B110	Draft proposed case management order.	0.4	202.00
06/04/19	J. Fullmer	B230	Read and analyze brief filed by CF II.	0.5	252.50
06/04/19	C. Nigro	B110	Calendar motion deadline per A. Bauer (.1); draft limited service list per J. Fullmer (.9); prepare index of binder for client per A. Bauer (.3); circulate limited service list to R. Reverendo (.1).	1.4	469.00
06/05/19	A. Bauer	B150	Prepare for, participate in and discuss follow up with client on 341 meeting with creditors (5.0); confer with W. Gray and M. Licker (.3).	5.3	4,770.00
06/05/19	A. Bauer	B190	Communications regarding deposition times.	0.2	180.00

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06/05/19	A. Bauer	B160	Emails to and from US Trustee on comments to applications.	0.4	360.00
06/05/19	W. Gray Jr.	B230	Review Counsel Financial Lien memo and confer w/ James Fullmer regarding the same;	3.8	3,515.00
06/05/19	M. Licker	B150	Telephone conference with A. Bauer regarding discovery issues for 341 meeting.	0.1	71.50
06/05/19	M. Licker	B190	Telephone conference with W. Gray regarding CF II discovery issues.	0.6	429.00
06/05/19	M. Licker	B190	Review and revise protective order and email to J. Liddle regarding revised protective order (0.3); email to W. Gray regarding document production status (0.1).	0.4	286.00
06/05/19	J. Fullmer	B230	Call with W. Gray regarding CF II brief.	0.1	50.50
06/05/19	J. Fullmer	B110	Draft revised proposed scheduling order.	0.3	151.50
06/06/19	A. Bauer	B110	Email to R. Reverendo re schedules (.1); call with C. Nigro on schedules and SOFAs and case update (.3).	0.4	360.00
06/06/19	A. Bauer	B230	Call with A. Akinrinade (.4).	0.4	360.00
06/06/19	A. Bauer	B150	Communications with C. Nigro, M. Licker, and J. Fullmer on court filings for creditors and follow up on 341 meeting.	1.0	900.00
06/06/19	A. Bauer	B190	Internal communications re 2004 examination issues; research case law on litigation issues.	2.2	1,980.00

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06/06/19	W. Gray Jr.	B230	Review Counsel Financial Reply Memorandum regarding perfection of lien; outline responsive arguments	3.5	3,237.50
06/06/19	M. Licker	B150	Telephone conference with A. Bauer regarding 341 meeting.	0.5	357.50
06/06/19	J. Fullmer	B110	Draft proposed case management order.	0.2	101.00
06/06/19	C. Nigro	B110	Call with A. Bauer regarding status update (.3); review schedules and statements of financial affairs per A. Bauer (.3); forward docket entry 55-A. Akinrinade per A. Bauer (.2); update limited service last with email addresses (.6).	1.4	469.00
06/07/19	A. Bauer	B150	Review and revise violation of auto stay letter and communications re same.	0.9	810.00
06/07/19	A. Bauer	B110	Attention to requests of information for case and revision of schedules and statement of financial affairs.	0.9	810.00
06/07/19	J. Fullmer	B110	Call to Chambers regarding filings.	0.1	50.50
06/07/19	C. Nigro	B110	Update forms 106 Schedules A, B, D, and F and Form 107 (1.4); research regarding filing amended schedules and statement of financial affairs (.4); forward J. Halter address to A. Bauer (.1).	1.9	636.50

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06/10/19	A. Bauer	20	Call with A. Akinrinade re May MOR and emails re same (.3).	0.3	270.00
06/10/19	A. Bauer	B190	Attention to communications on discovery and internal emails re same.	0.2	180.00
06/10/19	W. Gray Jr.	B230	Work on response to reply memorandum by Counsel Financial.	2.2	2,035.00
06/10/19	J. Fullmer	B110	Emails with C. Nigro regarding draft case management order.	0.1	50.50
06/10/19	C. Nigro	B110	Quality check schedules (.5); update limited service list (.4).	0.9	301.50
06/11/19	A. Bauer	B230	Call with A. Akinrinade.	0.2	180.00
06/11/19	A. Bauer	B110	Communications with C. Nigro re Amended schedules and attention to same.	0.3	270.00
06/11/19	W. Gray Jr.	B190	Work on Tara Liddle adversary proceeding (.4); work on deposition preparation and document production issues (.4); and telephone calls with Carla Nigro and Michael Licker regarding the same (.4).	1.2	1,110.00
06/11/19	W. Gray Jr.	B230	Work on preparation of argument for cash collateral issues regarding Counsel Financial's allegation of lien rights as against the sale proceeds.	2.7	2,497.50

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06/11/19	M. Licker	B190	Review document production to CF II regarding T. Liddle issue (0.5); telephone conference with W. Gray regarding same (0.2); prepare letter to M. Wexelbaum regarding T. Liddle discovery issue (0.7); telephone conference with W. Gray regarding sale proceeds (0.2).	1.6	1,144.00
06/11/19	C. Nigro	B110	Review updated schedules and highlight changes (.8); update schedules (.6); edit and update schedule tracking chart (.3); email client regarding information needed for schedules (.2); call clerk regarding status of orders (.2).	2.1	703.50
06/12/19	A. Bauer	B190	Email to D. Wander, Michael Wexelbaum re deposition dates; email to A. Schwartz (.1); call with J. Fullmer re same (.1)	0.2	180.00
06/12/19	W. Gray Jr.	B190	Review Tara Liddle production of documents issues; attend preparation of Tara Liddle for her discovery (1.4); phone call with James Fullmer regarding litigation (.1).	1.5	1,387.50
06/12/19	W. Gray Jr.	B190	Conference with David Wander; work on discovery responses to Rule 2004 examination.	1.2	1,110.00
06/12/19	M. Licker	B190	Call with J. Fullmer and review and revise letter to M. Wexelbaum concerning T. Liddle issue discovery.	0.3	214.50

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06/12/19	J. Fullmer	B190	Emails with A. Schwartz regarding scheduling order.	0.3	151.50
06/12/19	J. Fullmer	B190	Legal research regarding litigation issue (2.2); call with A. Bauer re same (.1).	2.3	1,161.50
06/12/19	J. Fullmer	B190	Calls with W. Gray and M. Licker regarding legal research on litigation issue.	0.2	101.00
06/13/19	A. Bauer	B110	Attention to automatic stay order.	0.3	270.00
06/13/19	W. Gray Jr.	B110	Confer with US Trustee regarding deposition schedules and filing of court motions.	0.4	370.00
06/13/19	W. Gray Jr.	B110	Confer regarding motion for extension of automatic stay under Section 105 with Kasowitz Benson.	0.6	555.00
06/13/19	W. Gray Jr.	B190	Conference with David Wander regarding discovery and related litigation issues (.6) and phone call with James Fullmer regarding related legal research (.1).	0.7	647.50
06/13/19	W. Gray Jr.	B230	Work on preparation of argument for cash collateral argument regarding lien claim against proceeds of sale of Manhattan apartment.	1.2	1,110.00
06/13/19	J. Fullmer	B190	Legal research regarding litigation issue.	0.7	353.50
06/13/19	J. Fullmer	B190	Call with W. Gray regarding legal research on litigation issue.	0.1	50.50

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06/13/19	J. Fullmer	B110	Attention to proposed order on automatic stay.	0.7	353.50
06/13/19	C. Nigro	B110	File monthly operating statement (.2); draft and file certificate of service (.4); email service of motions and schedule order (.3); calendar scheduling order (.5); pull cases regarding CFII's reply brief (.3); email with client regarding updating schedules (.1).	1.8	603.00
06/14/19	W. Gray Jr.	B110	Conferences with Kasowitz Benson and James Fullmer regarding automatic stay issue.	0.5	462.50
06/14/19	W. Gray Jr.	B230	Work on preparation of argument for cash collateral motion re Counsel Financial claim of security interest in sale proceeds (.8), phone calls with James Fullmer, Meredith Parkinson, and Michael Licker regarding cash collateral (.9).	1.7	1,572.50
06/14/19	W. Gray Jr.	B190	Attend deposition of Tara Liddle in the adversary proceeding Tara Liddle vs Counsel Financial.	2.2	2,035.00
06/14/19	M. Licker	B230	Telephone conference with W. Gray and J. Fullmer regarding cash collateral hearing preparation.	0.9	643.50
06/14/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	1.2	606.00

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06/14/19	J. Fullmer	B110	Attention to proposed order on automatic stay.	0.7	353.50
06/14/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.2	101.00
06/14/19	J. Fullmer	B230	Call with W. Gray, M. Parkinson, and M. Licker regarding cash collateral issue.	0.9	454.50
06/14/19	M. Parkinson	B230	Discuss UCC research with W. Gray and J. Fullmer; read cash collateral motion, reply, and response to same and begin researching definition of "money" under UCC; review filing checklist for non-individual cases; review form requirements and send list of same to A. Bauer.	3.1	1,844.50
06/17/19	A. Bauer	B110	Confer with J. Fullmer on stay order and attention to other orders entered by court.	0.2	180.00
06/17/19	A. Bauer	B190	Confer with W. Gray (.2).	0.2	180.00
06/17/19	W. Gray Jr.	B230	Prepare for oral hearing regarding contested Counsel Financial Lien; work on summary of oral argument.	3.2	2,960.00
06/17/19	W. Gray Jr.	B190	Meet with A. Bauer regarding 2004 motions (.2).	0.2	185.00
06/17/19	J. Fullmer	B230	Call with M. Parkinson regarding cash collateral issue.	0.1	50.50
06/17/19	J. Fullmer	B230	Legal research on cash collateral issue.	3.1	1,565.50
06/17/19	J. Fullmer	B110	Call with A. Bauer regarding automatic stay.	0.2	101.00

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06/17/19	J. Fullmer	B110	Draft correspondence regarding automatic stay.	0.5	252.50
06/17/19	C. Nigro	B110	Calendar case events.	0.4	134.00
06/18/19	A. Bauer	B190	Meeting with client and W Gray.	1.4	1,260.00
06/18/19	A. Bauer	B110	Prepare for meeting with W. Gray and J. Liddle (.4).	0.4	360.00
06/18/19	A. Bauer	B230	Distribution of variance report.	0.1	90.00
06/18/19	A. Bauer	B110	Review letter to Judge Kalish re automatic stay and correspondence with Kasowitz re same (.3); follow up chart on schedules for client (.3).	0.6	540.00
06/18/19	W. Gray Jr.	B190	Meeting with Jeffrey Liddle and Alison Bauer re document production, inspections and response to Rule 2004 examination.	1.4	1,295.00
06/18/19	W. Gray Jr.	B230	Conference with James Fullmer and Meredith Parkinson regarding cash collateral issues related to perfection of interest in money and accounts and related issues.	1.5	1,387.50
06/18/19	M. Licker	B190	Review CF II memorandum regarding security interest in sale proceeds.	0.2	143.00
06/18/19	J. Fullmer	B110	Call with D. Koch regarding automatic stay.	0.1	50.50
06/18/19	J. Fullmer	B230	Call with W. Gray and M. Parkinson regarding cash collateral issue.	1.1	555.50
06/18/19	J. Fullmer	B110	Emails with D. Koch regarding automatic stay.	0.5	252.50

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06/18/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	0.9	454.50
06/18/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.3	151.50
06/18/19	J. Fullmer	B110	Draft correspondence regarding automatic stay.	0.3	151.50
06/18/19	M. Parkinson	B230	Research re treatment of money under UCC; conference with W. Gray and J. Fullmer re same.	5.2	3,094.00
06/18/19	C. Nigro	B110	Calendar case events (.4); revise schedules (.6).	1.0	335.00
06/19/19	A. Bauer	B110	Follow up on schedules with J. Liddle (.1).	0.1	90.00
06/19/19	A. Bauer	B110	Attention to notifying various courts and parties of litigation against law firm that is stayed (.3) and confer with J. Fullmer (.1).	0.4	360.00
06/19/19	A. Bauer	B230	Call with Gray re accounting issues; attention to payroll.	0.5	450.00
06/19/19	W. Gray Jr.	B190	Work on extension of automatic stay to De Lage & Leaden suit.	0.3	277.50
06/19/19	W. Gray Jr.	B190	Review protective order.	0.4	370.00

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06/19/19	W. Gray Jr.	B230	Confer with Alison Bauer regarding accounting and payroll (.5); work on preparation of argument on objection to Counsel Financial's purported lien including conferences with James Fullmer, Michael Licker, and Meredith Parkinson regarding UCC issues (1.3).	1.5	1,387.50
06/19/19	M. Licker	B230	Review CF II briefing regarding alleged security interest in J. Liddle home sale proceeds (1.6); conference with W. Gray, J. Fulmer and M. Parkinson regarding preparation for hearing on alleged security interest (1.3).	2.9	2,073.50
06/19/19	J. Fullmer	B110	Call with A. Bauer regarding automatic stay.	0.1	50.50
06/19/19	J. Fullmer	B230	Call with W. Gray, M. Licker, and M. Parkinson regarding cash collateral issue.	1.3	656.50
06/19/19	J. Fullmer	B110	Draft correspondence regarding automatic stay.	1.1	555.50
06/19/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	1.1	555.50
06/19/19	J. Fullmer	B110	Call with D. Koch regarding automatic stay.	0.1	50.50
06/19/19	M. Parkinson	B230	Further research re treatment of money under the UCC (3.2); conference with W. Gray, M. Licker, and J. Fullmer re: same (1.3).	4.5	2,677.50

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06/20/19	A. Bauer	B110	Attention to extension of stay notifications to courts and letters (.4); preparation of hearing agenda (.3); review/revision of case management motion and order (.4); attention to creditor matrix and schedule issues (.3).	1.3	1,170.00
06/20/19	A. Bauer	B190	Attention to Rule 2004 inspection issues and litigation.	0.2	180.00
06/20/19	W. Gray Jr.	B190	Conference call with David Wander regarding Rule 2004 examination issues and the like (.4); call with Michael Licker regarding hearing (.1)	0.5	462.50
06/20/19	W. Gray Jr.	B230	Work on preparations for oral argument regarding contested lien motion of Counsel Financial (3.1), and phone call with James Fullmer regarding cash collateral (.5).	3.6	3,330.00
06/20/19	M. Licker	B190	Legal research regarding CF II alleged security interest (0.4); telephone conference with W. Gray regarding preparation for hearing (0.1).	0.5	357.50
06/20/19	J. Fullmer	B230	Draft correspondence to court regarding cash collateral hearing.	0.4	202.00
06/20/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.5	252.50
06/20/19	J. Fullmer	B110	Draft correspondence regarding automatic stay.	0.1	50.50

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06/20/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	1.9	959.50
06/20/19	M. Parkinson	B230	Draft memo re UCC treatment of money; email correspondence with J. Fullmer re same; further research in connection with same.	5.1	3,034.50
06/20/19	C. Nigro	B110	File and email letter per W. Gray (.3); review notes from J. Liddle and edit schedules (.8); update limited service list (.6); research regarding IRS address per A. Bauer (.2); research regarding cash collateral filing per W. Gray (.4).	2.3	770.50
06/20/19	C. Nigro	B110	Circulate docket entries regarding Rule 1007 affidavit per M. Parkinson.	0.2	67.00
06/21/19	A. Bauer	B190	Numerous conferences with W. Gray and analysis of issues, research and drafting arguments for cash collateral hearing.	5.0	4,500.00
06/21/19	W. Gray Jr.	B230	Preparations for hearing regarding contested lien motion of Counsel Financial (4.8) and confer with James Fullmer regarding cash collateral issue (.2)	5.0	4,625.00
06/21/19	W. Gray Jr.	B190	Conferences with Alison Bauer, Michael Licker, and Meredith Parkinson.	1.2	1,110.00
06/21/19	J. Fullmer	B110	Draft correspondence relating to automatic stay.	0.2	101.00

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06/21/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	2.6	1,313.00
06/21/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.2	101.00
06/21/19	M. Parkinson	B230	Finalize memo on treatment of money under the UCC and send to W. Gray; read Gemini case and email correspondence with J. Fullmer re same.	3.8	2,261.00
06/21/19	C. Nigro	B110	Prepare agenda for Cash Collateral motion (.6); assist with preparation of hearing binder (.3); file and email agenda (.3); file and email letter regarding Paparella v. L&R (.3); update and correct creditor matrix addresses (.3); circulate updated matrix (.2); calendar events (.1).	2.1	703.50
06/22/19	A. Bauer	B230	Review and revise outline for hearing (1.1).	1.1	990.00
06/22/19	W. Gray Jr.	B230	Telephone call with James Fullmer regarding the cash collateral (.3); prepare for oral argument before Judge Lane regarding debtor's challenge to Counsel Financial's claim for a lien on the Sale Proceeds arising from the New York co-operative apartment owned by the debtor and his wife (2.7).	3.0	2,775.00
06/22/19	M. Licker	B190	Review oral argument outline on CF II security interest claim.	0.2	143.00

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06/22/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	3.5	1,767.50
06/22/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issue.	0.3	151.50
06/23/19	W. Gray Jr.	B230	Prepare for oral argument before Judge Lane regarding debtor's challenge to Counsel Financial's claim for a lien on the Sale Proceeds arising from the New York co-operative apartment owned by the debtor and his wife.	2.7	2,497.50
06/24/19	A. Bauer	B230	Prepare for argument and participate in hearing and follow up with client.	6.0	5,400.00
06/24/19	A. Bauer	B150	Correspondence regarding insurance premiums.	0.1	90.00
06/24/19	W. Gray Jr.	B230	Prepare for and argue motion to invalidate perfection of Counsel Financial lien on Sale Proceeds	5.5	5,087.50
06/24/19	W. Gray Jr.	B190	Deposition of Jeffrey Liddle with regards to the adversary proceeding commenced by Tara Liddle.	2.0	1,850.00
06/24/19	J. Fullmer	B230	Call with A. Bauer and W. Gray regarding cash collateral hearing.	0.2	101.00
06/24/19	J. Fullmer	B230	Legal research regarding cash collateral issue.	0.6	303.00
06/24/19	J. Fullmer	B110	Draft proposed case management order.	1.1	555.50
06/24/19	J. Fullmer	B110	Attention to amended schedules.	1.6	808.00

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06/24/19	C. Nigro	B110	Assist with hearing binder preparation (.4); calendar events (.2); emails with A. Bauer regarding docket entries in preparation for hearing.	0.8	268.00
06/25/19	A. Bauer	B110	Call with M. Parkinson (.3); review and drafting of various motions and orders (2.0).	2.3	2,070.00
06/25/19	W. Gray Jr.	B110	Review retention filings and other case administrative filings; review docket.	1.2	1,110.00
06/25/19	J. Fullmer	B110	Call with A. Bauer regarding proposed case management order.	0.1	50.50
06/25/19	J. Fullmer	B160	Attention to retention applications.	0.7	353.50
06/25/19	C. Nigro	B110	Update and edit schedules (.6); create list of needed information (.5); emails with R. Reverendo (.1).	1.2	402.00
06/26/19	A. Bauer	B160	Review pleadings and call with Fullmer (.3).	0.3	270.00
06/26/19	A. Bauer	B230	Call with A. Akinrinade (.3); confer with Gray on cash collateral order and budget (.2); drafting order (.9).	1.4	1,260.00
06/26/19	W. Gray Jr.	B190	Work on various discovery issues including conferences with Counsel Financial's counsel regarding inspection dates and document productions in response to Rule 2004 request.	1.7	1,572.50

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06/26/19	W. Gray Jr.	B230	Meet with Alison Bauer regarding the budget (.2); work on post-hearing summary and preparation of court order; review transcript (.3).	0.5	462.50
06/26/19	J. Fullmer	B160	Attention to retention applications.	0.7	353.50
06/26/19	J. Fullmer	B110	Draft proposed case management order.	1.0	505.00
06/26/19	J. Fullmer	B190	Attention to motion for relief from automatic stay.	0.4	202.00
06/26/19	J. Fullmer	B160	Call with A. Bauer regarding retention applications.	0.2	101.00
06/26/19	J. Fullmer	B160	Call to A. Schwartz regarding retention applications.	0.1	50.50
06/26/19	J. Fullmer	B110	Call with R. Reverendo regarding creditor information.	0.1	50.50
06/26/19	J. Fullmer	B110	Meeting with M. Parkinson regarding case status.	0.4	202.00
06/27/19	A. Bauer	B110	Planning for upcoming motions and internal communications re same.	0.8	720.00
06/27/19	W. Gray Jr.	B190	Work on scheduling inspections; work on document production; review draft protective order.	0.8	740.00
06/27/19	J. Fullmer	B110	Finalize and file proposed case management order.	2.3	1,161.50
06/27/19	J. Fullmer	B230	Attention to proposed order on cash collateral issue.	0.5	252.50

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06/27/19	M. Parkinson	B110	Draft exclusivity extension motion; emails with A. Bauer and W. Gray re timing of filing motion and need to shorten notice; emails with J. Fullmer re same; review local and chambers rules re timing of filing motions.	3.4	2,023.00
06/27/19	C. Nigro	B110	Update limited service list (.3); email with J. Fullmer regarding same (.2); file and serve case management order and notice of presentment (.9); calendar case events (.3); log JLL memorandums (.3)	2.0	670.00
06/28/19	A. Bauer	B110	Attention to reports, creditor requests and pleadings.	0.2	180.00
06/28/19	W. Gray Jr.	B240	Communications and correspondence with Internal Revenue Service regarding filings of tax returns for J Liddle (personally) and for Liddle & Robinson, getting further extension of time thereof.	0.5	462.50
06/28/19	W. Gray Jr.	B190	Review production of inventory from storage facilities in response to Rule 2004 examination and make production of inventory to Counsel Financial.	0.4	370.00
06/28/19	W. Gray Jr.	B110	Phone communication with Michael Licker regarding case strategy.	0.5	462.50
06/28/19	M. Licker	B110	Telephone conference with W. Gray regarding Chapter 11 strategy plan.	0.5	357.50

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06/28/19	J. Fullmer	B240	Attention to correspondence with IRS.	0.3	151.50
06/28/19	J. Fullmer	20	Attention to budgeting issues.	0.5	252.50
06/28/19	J. Fullmer	B230	Attention to automatic stay issues.	0.3	151.50
06/28/19	M. Parkinson	B160	Draft interim compensation motion for Foley Hoag and EisnerAmper.	3.1	1,844.50
06/28/19	C. Nigro	B110	Update limited service list with undeliverable emails.	0.2	67.00
06/29/19	W. Gray Jr.	B190	Attend inspection of Jeffrey Liddle's Hamptons property by Counsel Financial representative.	0.5	462.50
Less Discount Applied					(15,888.45)
TOTALS				220.1	\$142,996.05

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Foley Hoag LLPCosts Incurred by Cost Code and Timekeeper on 36173.00002
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Employee		Costs Billed
005X Conference Call		
3152	Bauer, Alison D.	\$37.00
2653	Fullmer, James S.	\$6.50
3153	Gray Jr., William F.	\$37.00
2187	Licker, Michael	\$4.15
005X Conference Call Total:		\$84.65
027X Courier Services		
3152	Bauer, Alison D.	\$34.40
027X Courier Services Total:		\$34.40
029X Express Delivery (FEDEX)		
3152	Bauer, Alison D.	\$34.14
2653	Fullmer, James S.	\$33.33
029X Express Delivery (FEDEX) Total:		\$67.47
050 In-House Photocopying		
3152	Bauer, Alison D.	\$288.00
050 In-House Photocopying Total:		\$288.00
055 In-House B&W Printing - Outsourced		
3152	Bauer, Alison D.	\$6.48
055 In-House B&W Printing - Outsourced Total:		\$6.48
056 In-House Color Printing - Outsourced		
3152	Bauer, Alison D.	\$9.00
1065	Nigro, Carla A.	\$42.50
056 In-House Color Printing - Outsourced Total:		\$51.50
101B Tabs		
3152	Bauer, Alison D.	\$24.60
101B Tabs Total:		\$24.60
101G Document Production 1-999		
1065	Nigro, Carla A.	\$0.24
101G Document Production 1-999 Total:		\$0.24
101H Document Production 1000 or more		
1674	Porrata, Cynthia E.	\$251.30
101H Document Production 1000 or more Total:		\$251.30
176 Litigation Technology Services		
2011	Leung, Eric	\$1,239.50
176 Litigation Technology Services Total:		\$1,239.50
206X Meals		
3153	Gray Jr., William F.	\$56.84
206X Meals Total:		\$56.84

Foley Hoag LLP
Pg. 75 of 122
Costs Incurred by Cost Code and Timekeeper on 36173.00002

Invoice 4000713

Employee		Costs Billed
312 Computer Research, PACER		
2701	Bennett, Sarah S.	\$166.20
312 Computer Research, PACER Total:		\$166.20
Grand Total:		\$2,271.18

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Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
07/01/19	W. Gray Jr.	B110		Work on preparation of filing matters for Liddle & Robinson firm.	1.2
07/01/19	M. Licker	B190		Telephone conference with M. Parkinson regarding motion to extend exclusivity (0.2); review and revise motion to extend exclusivity (1.1).	1.3
07/01/19	J. Fullmer	B230		Draft proposed order regarding cash collateral issue.	0.4
07/01/19	J. Fullmer	B110		Attention to amended schedules and statement of financial affairs.	1.8
07/01/19	J. Fullmer	B110		Attention to automatic stay issues.	2.4
07/01/19	M. Parkinson	B110		Continue drafting motion to extend exclusivity; review docket to determine work done to date in case; discuss case status and logistics and send draft of extension motion to M. Licker for review; coordinate filing logistics with J. Fullmer	2.0
07/01/19	C. Nigro	B110		Calendar case events (.1); email with J. Fullmer regarding schedules (.3); correspondence with R. Reverendo regarding schedules (.3); update schedules in preparation for filing amendments (.6).	1.3
07/02/19	W. Gray Jr.	B230		Review and prepare final order regarding inefficacy of Counsel Financial's alleged cash collateral lien on sale proceeds.	0.8
07/02/19	W. Gray Jr.	B110		Preparation for Liddle & Robinson filing including schedule of all first-day orders.	0.8

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07/02/19	W. Gray Jr.	B110	Conference call re case administration issues; work on exclusivity motion with Meredith Parkinson and prepare for filing.	0.5
07/02/19	J. Fullmer	B110	Edit motion to extend exclusivity.	0.9
07/02/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral issues.	0.2
07/02/19	J. Fullmer	B230	Attention to cash collateral issues.	1.7
07/02/19	J. Fullmer	B110	Attention to schedules and statement of financial affairs.	1.9
07/02/19	J. Fullmer	B160	Attention to revised retention applications.	0.1
07/02/19	M. Parkinson	B110	Review noticing requirements; confer with W. Gray re motion to extend exclusivity.	0.9
07/02/19	C. Nigro	B110	Update schedules with comments from R. Reverendo (.9); confer with J. Fullmer regarding cash collateral order (.2); call Courtroom Deputy regarding same (.1); update addendum sheet to Schedule 107 (.4); email order to Judge Lane's chambers (.1); emails with J. Fullmer regarding service lists (.1); order and process hearing transcript (.2).	2.0
07/03/19	J. Fullmer	B160	Attention to retention applications.	0.8
07/03/19	J. Fullmer	B110	Finalize, file and serve motion to extend exclusivity.	1.4
07/05/19	J. Fullmer	B160	Emails with A. Bauer regarding retention applications.	0.6
07/07/19	J. Fullmer	B160	Attention to retention applications.	0.9

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07/08/19	A. Bauer	B110	Review and revise various motions, notices, applications and declarations and various communications with Foley Hoag team members including J. Fullmer, W. Gray and M. Parkinson.	3.0
07/08/19	A. Bauer	B140	Work on responses to M&T and VW motions for relief from stay.	1.0
07/08/19	W. Gray Jr.	B190	Review of claims versus former partners of JLL; conference call with Blaine Bortnick re various issues relating to lawsuits of Liddle & Robinson.	0.6
07/08/19	W. Gray Jr.	B110	Preparation of Liddle & Robinson pleadings and first-day motions.	1.4
07/08/19	J. Fullmer	B160	Attention to retention applications.	5.2
07/08/19	J. Fullmer	B110	Attention to revised schedules and statement of financial affairs.	0.5
07/08/19	J. Fullmer	B110	Draft and file notice regarding adjournment of hearing.	1.0
07/08/19	J. Fullmer	B110	Call with A. Bauer regarding hearing schedule.	0.2
07/08/19	J. Fullmer	B230	Call with M. Parkinson regarding cash collateral issue.	0.1
07/08/19	J. Fullmer	B230	Legal research on cash collateral issue.	0.4
07/08/19	M. Parkinson	B140	Review M&T Bank Stay Relief Motion and Brief; discuss same with A. Bauer; research re 362 applicability.	2.1

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07/09/19	A. Bauer	B110	Various calls and emails with R. Reverendo (.4); confer with J. Liddle (.8); attention to profit sharing plan issues (.3); conference with Gray and Licker (1.0); conference with internal team members (.5); comment upon interim compensation motion (.2); attention to list of open tasks (.3); attention to homestead exemption motion (.3); attention to comment to Case Management Order (.2).	4.0
07/09/19	W. Gray Jr.	B110	Meeting with Alison Bauer and Michael Licker re preparations for firm filing.	1.0
07/09/19	W. Gray Jr.	B110	Review case management order and various issues.	0.3
07/09/19	W. Gray Jr.	B160	Review status of retentions of Foley Hoag and Torys.	0.3
07/09/19	M. Licker	B110	Telephone conference with W. Gray and A. Bauer regarding preparation for L&R filing (1.0); telephone conference with A. Bauer, M. Parkinson and R. Reverendo regarding L&R filing preparation (0.4).	1.4
07/09/19	J. Fullmer	B160	Attention to retention applications.	2.1
07/09/19	J. Fullmer	B110	Attention to service of motion to extend exclusivity.	1.0
07/09/19	J. Fullmer	B110	Correspondence regarding automatic stay.	0.7
07/09/19	J. Fullmer	B230	Legal research on cash collateral issue.	0.5
07/09/19	J. Fullmer	B230	Call with M. Parkinson regarding cash collateral issue.	0.1
07/09/19	J. Fullmer	B110	Review objection to proposed case management order.	0.2
07/09/19	M. Parkinson	B160	Revisions to interim compensation motion and review local and chambers rules re timing of interim fee applications.	1.5

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07/09/19	M. Parkinson	B140	Call to M&T counsel to discuss adjournment of stay relief motion and follow up call to A. Bauer re same.	0.5
07/10/19	A. Bauer	B110	Various internal emails and external emails to ordinary course professionals on tax issues ; attention to case management order.	0.4
07/10/19	A. Bauer	B140	Call with M. Parkinson on M&T motion (.7); analysis of secured claims (1.0).	1.7
07/10/19	J. Fullmer	B110	Call to Chambers regarding submission of proposed order.	0.1
07/10/19	J. Fullmer	B110	Attention to revised proposed case management order.	1.3
07/10/19	J. Fullmer	B110	Calls with M. Parkinson regarding first day petition.	0.4
07/10/19	J. Fullmer	B110	Attention to correspondence regarding automatic stay issue.	1.0
07/10/19	J. Fullmer	B160	Call to A. Schwartz regarding retention applications.	0.1
07/10/19	J. Fullmer	B110	Attention to first day motions.	1.9
07/10/19	J. Fullmer	B110	Conference with M. Parkinson regarding first day motions.	0.2
07/10/19	J. Fullmer	B110	Call with M. Parkinson and R. Reverendo regarding first day motions.	0.5
07/10/19	J. Fullmer	B110	Call with A. Bauer and M. Parkinson regarding first day petition.	0.5
07/10/19	J. Fullmer	B110	Call with A. Bauer regarding case administration issues.	0.1
07/11/19	A. Bauer	B230	Call with A. Akinrinade re accounting issues (.6); confer with Gray & Akinrinade (.2); confer with Gray (.2); call with court clerk on order (.1).	1.1
07/11/19	A. Bauer	B110	Analysis and drafting numerous emails with team regarding case administration issues.	0.7

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07/11/19	A. Bauer	B160	Call with C. Caparelli of Torgys re retention application.	0.2
07/11/19	W. Gray Jr.	B190	Work on discovery issues including review of bank statements to be produced and Beach and Valero letter.	0.7
07/11/19	W. Gray Jr.	B110	Work on ordinary course of business professionals retention.	0.3
07/11/19	W. Gray Jr.	B110	Work on commencement of Liddle & Robinson bankruptcy case.	1.2
07/11/19	W. Gray Jr.	B190	Conference with client and Arnold Reiter re Tara Liddle Adversary Proceeding.	0.3
07/11/19	W. Gray Jr.	B230	Telephone calls with Eisner and Alison Bauer re accounting.	0.4
07/11/19	M. Licker	B110	Review and revise first day affidavit.	0.7
07/11/19	J. Fullmer	B160	Edit motion for interim compensation.	0.3
07/11/19	J. Fullmer	B110	Call with A. Bauer regarding document collection.	0.1
07/11/19	J. Fullmer	B110	Call with M. Parkinson regarding document collection.	0.1
07/11/19	J. Fullmer	B110	Prepare for document collection, collect documents, and review documents for use in bankruptcy filing.	8.5
07/12/19	A. Bauer	B140	Composed email to M Parkinson re M&T bank.	0.1
07/12/19	A. Bauer	B160	Composed email re retention.	0.1
07/12/19	A. Bauer	B230	Composed email re cash collateral.	0.1
07/12/19	A. Bauer	B110	Attention to first day pleadings (.5); confer with Fullmer (.3).	0.8
07/12/19	M. Licker	B110	Review and revise first day motions.	2.8
07/12/19	J. Fullmer	B160	File motion for interim compensation.	0.8

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07/12/19	J. Fullmer	B110	Collect and review documents for use in bankruptcy filing.	5.3
07/12/19	M. Parkinson	B140	Emails with A. Bauer and counsel to M&T re adjournment of stay relief motion.	0.2
07/13/19	J. Fullmer	B110	Draft first day motions.	1.2
07/14/19	J. Fullmer	B110	Review and update list of creditors for bankruptcy filing.	1.5
07/14/19	J. Fullmer	B110	Draft first day motions.	0.8
07/15/19	A. Bauer	B110	Numerous conferences with W. Gray (.2); confer with -' and emails to M Licker (.1) ; attention to scheduling issues (.1); attention to MOR (.1); attention to motions (.2).	0.7
07/15/19	A. Bauer	B110	Call with M. Parkinson (.1); emails to team re filing (.3); attention to cash collateral and budget (.2).	0.6
07/15/19	W. Gray Jr.	B110	Confer w/ A. Bauer; work on scheduling a deposition in response to Rule 2004 request and document production.	0.4
07/15/19	W. Gray Jr.	B160	Work on Foley Hoag supplemental retention papers as well as supplemental retention papers for EisnerAmper and Torys LLP and discuss with J. Fullmer.	0.5
07/15/19	W. Gray Jr.	B110	Review Liddle & Robinson filing papers.	1.8
07/15/19	M. Licker	B110	Review and revise first day motions (2.5); telephone conferences with M. Parkinson and J. Fullmer regarding preparation of first day motions (1.2); telephone conference with W. Gray regarding first day motions (0.5).	4.2
07/15/19	J. Fullmer	B110	Collect documents and prepare papers for first day motions.	8.4

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07/15/19	J. Fullmer	B110	Attention to automatic stay and case administration issues.	0.3
07/15/19	J. Fullmer	B110	Call with W. Gray regarding first day motions.	0.3
07/15/19	J. Fullmer	B110	Calls with M. Licker and M. Parkinson regarding first day motions.	1.2
07/15/19	J. Fullmer	B160	Call with W. Gray regarding retention applications.	0.1
07/15/19	J. Fullmer	B110	Call with M. Licker regarding first day motions.	0.2
07/15/19	C. Nigro	B110	Draft and file certificate of service (0.6); file monthly operating statement (0.2); coordinate service mailing of Monthly Operating Statement (0.7); update creditor Matrix (0.9); edit spreadsheet of creditors (0.4); review updated creditor Matrix and compare to initial conflict list (0.7).	3.5
07/16/19	W. Gray Jr.	B190	Review filings and correspondence on Tara Liddle Adversary Proceeding.	1.4
07/16/19	W. Gray Jr.	B190	Conference call with David Wander re discovery issues.	0.4
07/16/19	M. Licker	B110	Review and revise first day motions.	1.5
07/16/19	M. Licker	B110	Call with M. Parkinson and J. Fullmer re first day motions prep.	0.5
07/16/19	J. Fullmer	B110	Collect documents and prepare papers for first day motions.	4.9
07/16/19	J. Fullmer	B110	Call with M. Licker and M. Parkinson regarding first day motions.	0.5
07/16/19	J. Fullmer	B110	Call with C. Nigro and A. Neugebauer regarding first day motions.	0.3
07/16/19	J. Fullmer	B110	Calls with J. Liddle regarding first day motions.	0.3

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07/16/19	C. Nigro	B110	Draft agenda for 7/22 hearing (0.9); confer with J. Fullmer regarding hearing (0.3); prepare notice of adjournment for M&T Bank per M. Parkinson (0.3); update creditor Matrix distribution (0.6).	2.1
07/17/19	A. Bauer	B110	Communications with Gray and Judge's chambers.	0.2
07/17/19	A. Bauer	B110	Review and revise agenda.	0.1
07/17/19	W. Gray Jr.	B110	Preparation of Liddle & Robinson filing papers; confer with James Fullmer.	2.4
07/17/19	M. Licker	B110	Telephone conference with W. Gray regarding first day motions (0.2); telephone conference with M. Parkinson and J. Fullmer regarding first day motions (0.3).	0.5
07/17/19	M. Licker	B190	Review and revise reply in support of exclusivity motion.	0.3
07/17/19	J. Fullmer	B160	Call with A. Schwartz regarding retention applications.	0.4
07/17/19	J. Fullmer	B110	Call with W. Gray regarding first day motions.	0.5
07/17/19	J. Fullmer	B160	Attention to retention applications.	1.0
07/17/19	J. Fullmer	B110	Draft reply in support of motion to extend exclusivity.	2.1
07/17/19	J. Fullmer	B110	Call with M. Licker and M. Parkinson regarding first day motions.	0.3
07/17/19	A. Neugebauer	B110	Electronic correspondence with J. Fullmer regarding bankruptcy filing forms and status of filing.	0.2
07/18/19	A. Bauer	B110	Call with Nigro and revisions to agenda.	0.3
07/18/19	A. Bauer	B110	Analysis of Cash collateral calls and motion and budget issues.	0.5

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07/18/19	A. Bauer	B230	Phone calls with A. Akinrinade.	0.2
07/18/19	A. Bauer	B110	Phone calls from/to Meredith S. Parkinson regarding first day motions.	0.5
07/18/19	A. Bauer	B110	Call with M. Parkinson and D. Wander on cash collateral (.5); follow up with Gray and Parkinson (.2) review motion and order (.3); calls with M. Parkinson (.3); numerous calls with A. Akinrinade re budget (.6).	1.8
07/18/19	A. Bauer	B110	Call with J. Fullmer on first day issues.	0.3
07/18/19	A. Bauer	B160	Communications with team regarding retention applications (.2).	0.2
07/18/19	W. Gray Jr.	B110	Preparation papers; review all first-day motions; review Rule 1007 Affidavit.	5.7
07/18/19	M. Licker	B110	Review and revise first day motions.	3.1
07/18/19	J. Fullmer	B110	Call with W. Gray regarding first day motions.	0.1
07/18/19	J. Fullmer	B160	Finalize and serve retention applications.	0.9
07/18/19	J. Fullmer	B110	Finalize reply in support of motion to extend exclusivity.	0.2
07/18/19	J. Fullmer	B110	Call with M. Parkinson regarding first day motions.	0.1
07/18/19	J. Fullmer	B110	Call with A. Bauer regarding first day motions.	0.3
07/18/19	J. Fullmer	B110	Draft Foley Hoag retention application.	1.2
07/18/19	J. Fullmer	B110	Collect documents and prepare papers for first day motions.	2.0

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07/18/19	C. Nigro	B110	Update hearing agenda (0.3); calendar case events (0.4); e-file documents in preparation for hearing (0.7); confer with A. Bauer regarding hearing (0.3); edit agenda (0.6); update Q drive file with Pacer entries to prepare hearing binder (0.5); update mailing labels (0.2); call clerk regarding changing J.L. Liddle's address (0.1); confer with J. Fullmer regarding e-filings and hearing agenda (0.5); review retention applications prior to e-filing (0.2).	3.8
07/19/19	A. Bauer	B110	Review first day motions and attention to notices and other court documents and internal communications regarding same; call with Fullmer and Liddle (.4).	1.3
07/19/19	A. Bauer	B110	Cash collateral - call with M. Parkinson (.1); call with M. Parkinson and D. Wander (.4); follow up on budget questions (.2); summary of issues (.2).	0.9
07/19/19	J. Fullmer	B110	Collect documents and prepare papers for first day motions.	4.8
07/19/19	J. Fullmer	B110	Calls with J. Liddle and A. Bauer regarding first day motions.	1.5
07/19/19	J. Fullmer	B110	Call with M. Parkinson regarding first day motions.	0.4
07/19/19	J. Fullmer	B110	Call with A. Neugebauer regarding first day motion process.	0.2
07/19/19	A. Neugebauer	B110	Telephone conferences and electronic correspondence with J. Fullmer and M. Parkinson regarding filing of bankruptcy petition and associated forms and motions; compile sample filings.	3.3

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07/20/19	A. Bauer	B110	Communications re cash collateral motion and order.	0.2
07/20/19	W. Gray Jr.	B110	Work on preparation of filings; confer with James Fullmer, M Parkinson, etc. re first-day pleadings and Rule 1007 Affidavit; review petition.	2.8
07/20/19	J. Fullmer	B110	Call with W. Gray regarding first day motions.	0.5
07/20/19	J. Fullmer	B110	Draft first day motions.	1.9
07/21/19	W. Gray Jr.	B110	Work on preparation of filings; confer with James Fullmer, M Parkinson, etc. re first-day pleadings and Rule 1007 Affidavit; review petition.	2.3
07/21/19	J. Fullmer	B110	Prepare papers for first day motions.	5.7
07/22/19	A. Bauer	B110	Call with D. Koch of Kasowitz Benson re hearing (.1); prepare for, participate in and attend hearing and confer with US Trustee (3.5); follow up with D. Koch and review letter to court (.1).	3.7
07/22/19	J. Fullmer	B110	Email to Court attaching proposed order on motion to extend exclusivity.	0.1
07/22/19	J. Fullmer	B140	Emails with W. Kozeny regarding VW lease issue.	0.3
07/22/19	M. Parkinson	B110	Review revised Rule 1007 affidavit of Jeff Liddle (1.1); call with courtroom deputy re scheduling (.3); prepare final filing versions of all first day motion (1.1); assist J. Fullmer with filing (.5)	3.0
07/22/19	M. Parkinson	B140	Emails to counsel for M&T re timing of adjournment of stay relief motion.	0.2
07/23/19	A. Bauer	B110	Draft letter to Justice Kalish and communicate with D. Koch re same (.2).	0.2
07/23/19	A. Bauer	B160	Call and emails with C Caparelli.	0.2

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07/23/19	A. Bauer	B190	Attention to CF Rule 2004 discovery request (.4); review of letter to Judge Lane re stay motion and communications with D. Koch (.3).	0.7
07/23/19	A. Bauer	B140	Attention to VW lease auto stay request and emails with Kozeny re same.	0.2
07/23/19	C. Nigro	B110	Calendar case events (.3); circulate orders issued by Judge Lane (.2); update Q drive file names (.4).	0.9
07/24/19	M. Licker	B190	Telephone conference with A. Bauer and M. Parkinson regarding discovery status (0.2); email to D. Wander regarding revised protective order (0.2); prepare documents for production to CF Financial (0.2).	0.6
07/24/19	J. Fullmer	B240	Draft letter to IRS regarding claim.	1.2
07/24/19	M. Parkinson	B110	Revise case management order per orders approved in AMR.	2.0
07/24/19	M. Parkinson	B330	Emails with W. Gray and J. Fullmer re creditors and notices of commencement of bankruptcy case.	0.3
07/24/19	P. Chourattana	B110	Review and quality check production.	0.2
07/24/19	E. Leung	B110	Process document in connection with JLL0000089 - JLL0000092 production, convert to PDF, at request of M. Licker.	1.0
07/25/19	A. Bauer	B190	Phone call with Michael Licker.	0.8
07/25/19	A. Bauer	B190	TLL Adversary Proceeding Conference call (.3); follow up with W. Gray (.2); attention to discovery requests and communications by and between D. Wander and M. Licker (.3).	0.8

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07/25/19	A. Bauer	B160	Meeting with C. Caparelli and J. Fong on Torys first and final fee application.	0.5
07/25/19	W. Gray Jr.	B190	Attend court conference call re pretrial conference on Tara Liddle matter and follow-up with A. Bauer.	0.4
07/25/19	M. Licker	B190	Telephone conference with J. Liddle regarding discovery issues (1.3); telephone conference with A. Bauer regarding discovery status (0.8); email to J. Liddle regarding open discovery issues (0.2).	2.3
07/25/19	C. Nigro	B110	Calendar hearing dates (.2); edit draft of Omnibus hearings (.3).	0.5
07/26/19	A. Bauer	B190	Attention to discovery issues.	0.2
07/26/19	M. Licker	B190	Telephone conference with W. Gray regarding document production (0.5); attention to document production to Counsel Financial (0.3); email to D. Wander regarding discovery issues (0.2); telephone conference with D. Wander regarding same (0.2).	1.2
07/26/19	M. Parkinson	B190	Revise and finalize amended motion for case management procedures, review revised limited service list for proposed order, and coordinate filing and service of same	2.1
07/26/19	E. Leung	B190	Process document in connection with JLL0000093 - JLL0000096 production.	0.5
07/29/19	M. Licker	B190	Review J. Liddle bank statements (0.4); telephone conference with J. Liddle regarding bank statements (1.0); prepare bank statements for production to Counsel Financial (0.4).	1.8

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07/29/19	P. Chourattana	B190	Analyze, process and import client documents into Relativity. Process Client Documents for OCR text recognition for review.	0.6
07/29/19	P. Chourattana	B190	Prepare, analyze and process document production. Create encrypted media for transmittal of electronic production.	1.0
07/29/19	E. Leung	B190	Quality check JLL0000097 - JLL0000256 production; export PDF format.	1.0
07/30/19	W. Gray Jr.	B190	Confer with Michael Licker and work on document productions of bank accounts and other statements and organization of discovery responses.	0.8
07/30/19	W. Gray Jr.	B190	Review homestead exemption motion.	0.3
07/30/19	M. Licker	B190	Telephone conference with W. Gray regarding discovery requests (0.6); telephone conference and emails with J. Liddle regarding discovery responses and requests (0.7)	1.3
07/30/19	C. Nigro	B110	Draft and e-file Certificate of Service (.3); calendar case deadlines (.2).	0.5
07/31/19	A. Bauer	B110	Attention to hearing dates, adjournments, objection deadlines and notices.	0.3
07/31/19	W. Gray Jr.	B190	Review draft pleadings regarding Tare Liddle Adversary Proceeding.	0.5
07/31/19	M. Licker	B190	Telephone conferences with J. Liddle regarding pending litigations against estate and settlement of litigation by former firm partner (2.4); emails to D. Wander regarding discovery (0.3).	2.7
07/31/19	J. Fullmer	B110	Email to D. Wander and M. Wexelbaum regarding 2004 examination.	0.1

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4004068
August 28, 2019
Page 17

This Invoice is for the Period Ending: July 31, 2019

Less Discount Applied

(13,440.90)

TOTALS

213.6

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Foley Hoag LLPCosts Incurred by Cost Code and Timekeeper on 36173.00002
Invoice 4004068

Employee		Costs Billed
027 Courier Services		
1206	Evers, Holly	\$47.61
027 Courier Services Total:		\$47.61
050 In-House Photocopying		
3152	Bauer, Alison D.	\$318.48
050 In-House Photocopying Total:		\$318.48
055 In-House B&W Printing - Outsourced		
3152	Bauer, Alison D.	\$22.44
055 In-House B&W Printing - Outsourced Total:		\$22.44
101B Tabs		
3152	Bauer, Alison D.	\$14.00
3116	Parkinson, Meredith S.	\$3.00
101B Tabs Total:		\$17.00
101G Document Production 1-999		
3116	Parkinson, Meredith S.	\$26.16
1674	Porrata, Cynthia E.	\$131.28
101G Document Production 1-999 Total:		\$157.44
101H Document Production 1000 or more		
2653	Fullmer, James S.	\$150.40
1585	Fusco, Ernestine	\$731.10
101H Document Production 1000 or more Total:		\$881.50
107 Investigative Services		
2187	Licker, Michael	\$1,000.00
107 Investigative Services Total:		\$1,000.00
200 Air Fare		
2653	Fullmer, James S.	\$84.30
200 Air Fare Total:		\$84.30
201 Taxi Fare		
2653	Fullmer, James S.	\$95.96
201 Taxi Fare Total:		\$95.96
204 Hotels & Related Expenses		
2653	Fullmer, James S.	\$381.03
204 Hotels & Related Expenses Total:		\$381.03
205 Train Fare		
2653	Fullmer, James S.	\$125.00
205 Train Fare Total:		\$125.00
206 Meals		
2653	Fullmer, James S.	\$0.00

Foley Hoag LLP
Costs Incurred by Cost Code and Timekeeper on 36173.00002

Invoice 4004068

Employee		Costs Billed
206 Meals		
3153	Gray Jr., William F.	\$0.00
3177	Rosehill, Phillip	\$0.00
206 Meals Total:		\$0.00
312 Computer Research, PACER		
2701	Bennett, Sarah S.	\$76.80
312 Computer Research, PACER Total:		\$76.80
Grand Total:		\$3,207.56

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4007055
September 26, 2019
Page 2

This Invoice is for the Period Ending: August 31, 2019

Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
07/09/19	M. Parkinson	B110		Discuss first day preparation with A. Bauer, M. Licker; introductory call with Rose Reverendo and schedule informational call; create skeletal drafts of all first day pleadings and update master case preparation list.	4.5
07/10/19	M. Parkinson	B110		Call with R. Reverendo to discuss background materials needed for first day pleadings (1); discuss first day preparation with A. Bauer (.5); attention to Rule 1007 affidavit; prepare initial draft of interim compensation motion, joint administration motion; ordinary course professionals motion; and motion to extend time to file schedules and statements and send same to M. Licker for review (4.3); revise first day filing checklist; prepare initial drafts of substantive motions (wages, cash management, taxes and insurance) and list of outstanding background information for J. Fullmer (1); meet with J. Fullmer to discuss agenda for client site visit (.3)	7.1
07/11/19	M. Parkinson	B110		Revise substantive motions with updated information from client (3.9) revise first day affidavit to reflect updated information in substantive motions (2); prepare draft corporate ownership affidavit (.8); emails with team re process and planning (.6).	7.3

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This Invoice is for the Period Ending: August 31, 2019

07/12/19	M. Parkinson	B110	Revise joint administration motion to reflect partnership and affiliate relationships (.5) ;revise noticing provisions in all motions (.8)	1.3
07/12/19	M. Parkinson	B230	Prepare initial draft of cash collateral motion.	3.1
07/12/19	M. Parkinson	B160	Revisions to interim compensation motion and review initial draft of A. Bauer re same (2); review emails from tax and pension professionals re invoicing (.6);	2.6
07/13/19	M. Parkinson	B110	Revise cash collateral motion, first day affidavit, and joint administration motion and send same to W. Gray for distribution to client.	2.1
07/15/19	M. Parkinson	B110	Calls, meetings with J. Fullmer and M. Licker re first day prep status and filing process (1.2); proofread and finalize motions for joint administration, interim compensation, extension of time to file schedules, and ordinary course professionals (3.5); review local counsel invoices for ordinary course professional motion (.6); emails re need for critical vendor relief (.5); review draft petition and creditor matrix and provide comments on same to J. Fullmer (1.5); review requirements for priority claim status (.8).	8.1
07/16/19	M. Parkinson	B110	Call with J. Fullmer and M. Licker re first day prep status; (.5); draft additional sections for 1007 Affidavit and revise existing draft (4.1); emails with J. Fullmer and M. Licker re insurance motion and revisions to same (1.3).	5.9

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Chapter 11 Case

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This Invoice is for the Period Ending: August 31, 2019

07/16/19	M. Parkinson	B230	Revise cash collateral motion per comments of W. Gray (1.6); revise cash management motion per comments of M. Licker (1.0)	2.6
07/17/19	M. Parkinson	B230	E-mails and calls with EisnerAmper re cash collateral budget (.8); revise cash management motion to reflect timing of opening of DIP account (.7);	1.5
07/17/19	M. Parkinson	B110	Emails and calls with J. Fullmer and M. Licker re corporate ownership and revise draft of corporate ownership statement (.6); review revised first day declaration circulated to client (2.3).	2.9
07/18/19	M. Parkinson	B160	Draft supporting declaration for Foley retention application.	2.6
07/18/19	M. Parkinson	B110	Proofread and revise first day declaration (1.1); discuss cash management motion with M. Licker (.2) and revise motion per comments of M. Licker (.5); prepare final filing versions of administrative motions (.7)	2.5
07/18/19	M. Parkinson	B230	Call with counsel to Counsel Financial to discuss proposed use of cash collateral (.7); follow-up call with A. Bauer re same (.5); calls, e-mails with EisnerAmper re revised budget for cash collateral order (.5); revise cash collateral motion per discussion with A. Bauer (.8); call with J. Fullmer re first day motions(.1)	2.6

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Jeffrey Lew Liddle
Chapter 11 Case

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This Invoice is for the Period Ending: August 31, 2019

07/19/19	M. Parkinson	B110	Prepare pro hac vice applications for M. Parkinson and M. Licker (.6); call to chambers to coordinate case conference and discuss timing of first day hearing (.1); prepare agenda for first day hearing (.5); prepare notice of first day motions (.5); proofread revised first day declaration and substantive motions (2.2); calls with J. Fullmer to discuss first day preparation and filing logistics (.4).	4.3
07/19/19	M. Parkinson	B230	E-mails with A. Bauer, J. Fullmer, and EisnerAmper re insurance line items in budget (.5); call with A. Bauer and counsel to Counsel Financial to discuss cash collateral (.4).	0.9
07/19/19	M. Parkinson	B160	Call to discuss Foley retention application.	0.4
07/25/19	M. Parkinson	B110	Draft amended joint motion for case management procedures and revise order accordingly (2.8)	2.8
08/01/19	A. Bauer	B110	Attention to agenda and pleadings.	0.2
08/01/19	W. Gray Jr.	B190	Review reply papers of Tara Liddle re release of her interest in the Sale Proceeds (.6); confer with M. Licker regarding case list (.2).	0.8
08/01/19	M. Licker	B190	Email to D. Wander regarding discovery (0.2); telephone conference with W. Gray regarding case list (0.2); telephone conference with A. Bauer regarding discovery.	0.6
08/01/19	J. Fullmer	B110	Update service lists.	2.0
08/01/19	C. Nigro	B110	Calendar case events (.2); process J. Liddle deposition transcript (.2); update hearing agenda for 8/8/19 hearing (.2); file hearing agenda (.2).	0.8

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Jeffrey Lew Liddle
Chapter 11 Case

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This Invoice is for the Period Ending: August 31, 2019

08/01/19	E. Ming	B110	Produce address labels.	0.3
08/02/19	A. Bauer	B110	Numerous internal communications re filings, agenda, service.	0.5
08/02/19	M. Licker	B190	Telephone conference with A. Bauer and W. Gray regarding discovery (0.2); email to J. Liddle regarding document collection for discovery (0.1); telephone conference with J. Liddle regarding discovery requests (1.0); review and revise Rule 2004 exam motions (1.7).	3.0
08/02/19	C. Nigro	B110	Prepare documents for mailing (.5); email same (.2).	0.7
08/05/19	C. Nigro	B110	Forward orders entered by Judge Lane to client (.2); calendar case dates (.2); prepare documents for service mailing (.6).	1.0
08/06/19	A. Bauer	B190	Call with J. Liddle (.9); internal emails and emails with client (.2).	1.1
08/06/19	C. Nigro	B110	Draft Certificate of Service (.3); review Proof of Claims (.2); prepare filings for service (.4).	0.6
08/07/19	A. Bauer	B190	Meeting with Gray and R. Kelly.	0.4
08/07/19	A. Bauer	B230	Call with A. Akinrinade and with W. Gray (.8); review info for MOR (.2).	1.0
08/07/19	W. Gray Jr.	B110	Review M&T judgment and seek vacatur as violation of automatic stay. Confer with M Parkinson re same.	0.3
08/07/19	M. Licker	B190	Prepare Rule 2004 motions.	1.5
08/08/19	A. Bauer	B190	Prepare for, travel to and from and attend court hearing (3.5); confer with W. Gray (.4).	3.9

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Jeffrey Lew Liddle
Chapter 11 Case

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This Invoice is for the Period Ending: August 31, 2019

08/08/19	A. Bauer	B190	Attention to emails re T.Liddle adversary proceeding issues (.2); attention to D. Wander letter and response thereto (.2).	0.4
08/08/19	J. Fullmer	B110	Emails with A. Bauer regarding creditor issues.	0.1
08/08/19	C. Nigro	B110	Update and file Certificate of Service (.2); add news article to Q drive (.1).	0.3
08/09/19	A. Bauer	B190	Call with Gray.	0.2
08/09/19	A. Bauer	B230	Wells Fargo communications.	0.3
08/12/19	A. Bauer	B190	Attention to communications and draft documents in contested matters.	0.3
08/13/19	A. Bauer	B160	Attention to drafting of fee application.	0.2
08/13/19	W. Gray Jr.	B190	Review homestead exemption motion by Counsel Financial and confer with Fullmer re response.	0.5
08/14/19	A. Bauer	20	Attention to July MOR with Fullmer.	0.2
08/14/19	A. Bauer	B330	Attention to proofs of claims and emails with W. Gray re same.	0.1
08/14/19	J. Fullmer	20	Call with A. Bauer regarding filing of monthly operating report.	0.1
08/14/19	J. Fullmer	20	Finalize, file and serve monthly operating report.	1.6
08/14/19	R. Kelly	B160	Prepare draft Fee Application	1.8
08/16/19	C. Nigro	B110	File Notice of Proposed Order.	0.2
08/19/19	A. Bauer	B110	Internal communication re court orders.	0.2
08/19/19	C. Nigro	B110	Calendar case deadlines.	0.1
08/20/19	W. Gray Jr.	B140	Review M&T Bank claim and foreclosure action and vacating state court judgment.	0.5

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This Invoice is for the Period Ending: August 31, 2019

08/20/19	W. Gray Jr.	B190	Review objection to homestead exemption filed by Counsel Financial.	0.5
08/21/19	R. Kelly	B110	Prepare table of upcoming dates and deadlines, confer with A. Bauer re same (1.0); Team meeting (1.6); research time to perfect appeal, emails with J. Fullmer re same (.5); email to Billing Dep't re Fee Application (.1)	3.2
08/22/19	A. Bauer	B160	Call with R. Kelly and billing dept (.2); attention to preparation of fee application (.2).	0.4
08/22/19	J. Fullmer	B185	Email to W. Kozeny regarding lease.	0.1
08/22/19	J. Fullmer	B190	Legal research regarding homestead exemption.	0.5
08/22/19	R. Kelly	B110	Research re motion to extend time to perfect appeal, confer with W. Gray re same (1.0); Review Wells Fargo action in Suffolk County, track docket, emails with M. Parkinson re same (1.1); emails with C. Nigro re calendaring upcoming omnibus hearing (.4).	2.5
08/22/19	R. Kelly	B160	Meet with A. Bauer and calls to Billing Dep't, and Financial Analysis Dep't re Fee Application (.6).	0.6
08/22/19	C. Nigro	B110	Update case calendar (.1); download docket entries per A. Bauer (.2).	0.3
08/23/19	A. Bauer	B110	Confer with R. Kelly and attention to work in progress report and timeline.	0.2
08/23/19	R. Kelly	B110	Update meeting agenda and work-in-progress sheets (2.3); confer with W. Gray and A. Bauer re same (.2).	2.5
08/23/19	R. Kelly	B160	Review client bills for Fee Application.	0.7

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Chapter 11 Case

Invoice # 4007055
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This Invoice is for the Period Ending: August 31, 2019

08/25/19	J. Fullmer	B230	Legal research regarding homestead exemption.	0.4
08/26/19	R. Kelly	B160	Review client bills for Fee Application.	0.6
08/27/19	J. Fullmer	B230	Legal research regarding homestead exemption.	4.0
08/27/19	J. Fullmer	B230	Attention to cash collateral issues.	0.2
08/27/19	R. Kelly	B110	Calendar due date for tax filing per W. Gray letter to IRS	0.1
08/28/19	J. Fullmer	B230	Factual and legal research regarding liens.	3.0
08/28/19	J. Fullmer	B230	Draft response to objection regarding homestead exemption.	4.5
08/28/19	J. Fullmer	B185	Attention to leases and contracts issue.	0.3
08/28/19	R. Kelly	B110	Retrieve documents from Eerie County Supreme Court action (2.5); update firm calendar to reflect change in hearing time (.1).	2.6
08/28/19	R. Kelly	B160	Review client billing for Fee Application (1.0).	1.0
08/29/19	J. Fullmer	B230	Call with W. Gray regarding response to objection regarding homestead exemption.	0.2
08/29/19	J. Fullmer	B230	Legal research regarding homestead exemption.	0.4
08/29/19	J. Fullmer	B230	Attention to cash collateral issues.	0.1
08/29/19	R. Kelly	B160	Emails with J. Fullmer and A. Akinrinade re Fee Applications	0.5
08/30/19	R. Kelly	B160	Review billing entries in prep of filing Fee Application	2.5
Less Discount Applied				(6,987.50)
TOTALS				122.8

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Costs Incurred by Cost Code and Timekeeper on 36173.00002
Invoice 4007055

Employee		Costs Billed
027 Courier Services		
3152	Bauer, Alison D.	\$280.00
027 Courier Services Total:		\$280.00
028 Postage, including bulk mailings		
1065	Nigro, Carla A.	\$103.65
028 Postage, including bulk mailings Total:		\$103.65
029 Express Delivery (FEDEX)		
3152	Bauer, Alison D.	\$241.45
1065	Nigro, Carla A.	\$26.12
029 Express Delivery (FEDEX) Total:		\$267.57
050 In-House Photocopying		
3152	Bauer, Alison D.	\$402.72
3153	Gray Jr., William F.	\$152.52
050 In-House Photocopying Total:		\$555.24
101B Tabs		
3153	Gray Jr., William F.	\$2.80
3218	Kelly, Rachel	\$4.40
101B Tabs Total:		\$7.20
101G Document Production 1-999		
1065	Nigro, Carla A.	\$142.32
101G Document Production 1-999 Total:		\$142.32
201 Taxi Fare		
3152	Bauer, Alison D.	\$37.80
3153	Gray Jr., William F.	\$21.30
201 Taxi Fare Total:		\$59.10
206 Meals		
3153	Gray Jr., William F.	\$17.43
206 Meals Total:		\$17.43
312 Computer Research, PACER		
2701	Bennett, Sarah S.	\$275.60
312 Computer Research, PACER Total:		\$275.60
Grand Total:		\$1,708.11

36173.00002

Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 2

This Invoice is for the Period Ending: September 30, 2019

Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
09/03/19	A. Bauer	B230		Communications on cash collateral and budget.	0.1
09/03/19	A. Bauer	B140		Follow up on M&T and VW motions.	0.2
09/03/19	J. Fullmer	B110		Call with W. Gray regarding state court proceedings.	0.2
09/03/19	J. Fullmer	B110		Attention to state court proceedings.	0.3
09/04/19	A. Bauer	B110		Review of orders and follow up on open issues with internal team.	0.4
09/04/19	A. Bauer	B230		Attention to budget inquiries and review of approved transfers and emails to and from Reiter and A. Akininrade re same.	0.3
09/04/19	J. Fullmer	B110		Attention to state court proceedings.	0.9
09/04/19	J. Fullmer	B185		Attention to lease and contract issues.	0.3
09/04/19	J. Fullmer	B110		Call with W. Gray, B. Teoh, and R. Kelly regarding state court proceedings.	0.6
09/04/19	R. Kelly	B110		Meet with W. Gray, J. Fullmer, and B. Teoh re perfecting appeal, research procedure for filing stipulation to extend time, draft stipulation and circulate.	2.2
09/05/19	J. Fullmer	B110		Call with B. Teoh regarding state court proceedings.	0.1
09/05/19	J. Fullmer	B110		Attention to schedules and statements.	0.3
09/06/19	A. Bauer	B230		Revisions to draft of order (.4); call with Fullmer (.3); review opinion (.3).	1.0
09/06/19	J. Fullmer	B110		Attention to schedules and statements.	0.5

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

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This Invoice is for the Period Ending: September 30, 2019

09/06/19	J. Fullmer	B190	Draft proposed order regarding lien issue.	1.8
09/06/19	J. Fullmer	B190	Calls with A. Bauer regarding proposed order.	0.5
09/06/19	R. Kelly	B110	Retrieve and circulate Memo of Decision re claim of security interest; organize motion to lift stay exhibits	0.5
09/08/19	J. Fullmer	B110	Attention to schedules and statements.	0.4
09/09/19	J. Fullmer	B110	Attention to schedules and statements.	0.1
09/10/19	R. Kelly	B110	Organize and separate case files per A. Bauer.	1.0
09/11/19	A. Bauer	B150	Call with Randy White re court opinion.	0.2
09/11/19	W. Gray Jr.	B110	Review Homestead papers with James Fullmer.	0.5
09/11/19	J. Fullmer	B185	Attention to lease matter.	0.1
09/11/19	R. Kelly	B160	Review billing entries for Fee Application (2.0), emails with A. Akinrinade re same (.3); retrieve and circulate objection filed by CF II (.2); update internal calendar in advance of upcoming hearing, emails re same (.3).	2.8
09/12/19	J. Fullmer	B185	Attention to lease issue.	0.2
09/13/19	A. Bauer	B160	Confer with R. Kelly on fee application time entries.	0.5
09/13/19	C. Nigro	B110	Update case calendar.	0.2
09/16/19	A. Bauer	B110	Review and confer with R. Kelly on pleadings for agenda.	0.2
09/16/19	R. Kelly	B110	Draft agenda in preparation of omnibus hearing; emails with team re same.; update internal calendar; meet with A. Bauer re same.	1.4
09/17/19	R. Kelly	B110	Finalize and efile agenda and prepare binder for omnibus hearing	1.6

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Chapter 11 Case

Invoice # 4009953
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This Invoice is for the Period Ending: September 30, 2019

09/17/19	R. Kelly	B160	Review and finalize edits of billing entries in prep of fee application	2.4
09/18/19	R. Kelly	B160	Emails and calls with Billing and Finance depts re fee application	0.5
09/18/19	R. Kelly	B110	Emails with M. Parkinson and review of CourtCall requirements re attendance at omnibus hearing	0.2
09/19/19	A. Bauer	B190	Confer with J. Fullmer for homestead objection.	0.4
09/19/19	A. Bauer	B230	Prepare for and attend hearing on CFII decision and work on revised orders.	1.5
09/19/19	W. Gray Jr.	B230	Prepare for and attend hearing re dispute over nature of order relating to Court's memorandum decision denying secured creditor status to Counsel Financial re lien proceeds; work on revised orders re same.	2.5
09/19/19	J. Fullmer	B185	Draft proposed orders regarding relief granted in omnibus hearing.	2.7
09/19/19	J. Fullmer	B185	Attention to case administration matters.	0.8
09/19/19	R. Kelly	B110	Calls and emails re obtaining transcript of omnibus hearing	0.2
09/20/19	A. Bauer	B160	Attention to monthly fee applications.	0.2
09/20/19	A. Bauer	B190	Analysis of issues regarding adversary proceeding.	0.4
09/20/19	R. Kelly	B160	Emails with A. Bauer and M. Parkinson re fee application; research Pacer for fee application precedents; emails with S. Rosenthal and B. Frerichs re billing data; draft monthly fee applications and circulate for review.	3.4

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This Invoice is for the Period Ending: September 30, 2019

09/20/19	R. Kelly	B110	Emails with J. Fullmer re new hearing dates and file Notice of Schedule to docket (.5); schedule team meeting (.1)	0.6
09/22/19	J. Fullmer	B230	Attention to cash collateral matters.	1.0
09/23/19	W. Gray Jr.	B190	Meeting re organization of case agenda.	0.3
09/23/19	J. Fullmer	B230	Draft papers on cash collateral issue.	1.4
09/23/19	J. Teoh	B110	Conference with W Gray and R Kelly to discuss agenda and issues for 9/25 meeting with team.	0.5
09/23/19	R. Kelly	B160	Revise fee applications; emails with M. Parkinson re same (1.4); work with B. Frerichs re fee applications task and expenses break down (.2)	1.6
09/23/19	R. Kelly	B110	Meet with W. Gray and B. Teoh re case status (.5); revise agenda in advance of upcoming team meeting.	1.5
09/24/19	W. Gray Jr.	B190	Work on response to Counsel Financial's objection to the homestead exemption.	0.5
09/24/19	J. Fullmer	B185	Attention to lease matters.	0.2
09/24/19	J. Fullmer	B110	Attention to schedules and statements.	0.6
09/24/19	J. Teoh	B110	Researched excpetions to the occupancy requirement to the homestead exemption.	2.4
09/24/19	J. Teoh	B110	Attempted to contact IRS regarding extension of filing deadline.	0.2
09/24/19	R. Kelly	B190	Emails with W. Gray, J. Fullmer, and A. Reiter re proposed order denying CF2 perfected security interest.	0.3
09/24/19	R. Kelly	B160	Emails with B. Frerichs re fees and expenses	0.2

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This Invoice is for the Period Ending: September 30, 2019

09/24/19	R. Kelly	B110	Continue revising agenda in preparation of meeting (1.0); update internal calendar with upcoming hearing dates (.1)	1.1
09/25/19	A. Bauer	B110	Team status meeting.	0.5
09/25/19	W. Gray Jr.	B110	Team Status Meeting with Bauer, Fullmer, Parkinson, Teoh and Kelly.	0.5
09/25/19	M. Licker	B190	Attend team strategy meeting.	0.3
09/25/19	J. Fullmer	B110	Attention to schedules and statements.	1.4
09/25/19	J. Fullmer	B230	Attention to cash collateral matters.	0.1
09/25/19	J. Fullmer	B110	Attend team meeting regarding case status.	0.5
09/25/19	M. Parkinson	B110	Team meeting re status and next steps.	0.5
09/25/19	J. Teoh	B240	Attempted to contact IRS with W Gray to request extension of deadline to fill J Liddle's tax returns.	0.7
09/25/19	J. Teoh	B240	Drafted letter to IRS requesting time to extend deadline for filing tax returns.	0.5
09/25/19	J. Teoh	B240	Revised letter requesting tax return filing deadline extension and coordinated with P Rosehill to effect delivery.	0.2
09/25/19	J. Teoh	B110	Conference with W Gray, A Bauer, J Fullmer, M Parkinson, M Licker and R Kelly to discuss agenda and ongoing issues.	0.5
09/25/19	J. Teoh	B110	Researched whether a second motion to extend exclusivity period would incur a higher burden of proof and whether the exclusivity deadlines can be combined in a jointly administered case.	1.5

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953
October 21, 2019
Page 7

This Invoice is for the Period Ending: September 30, 2019

09/26/19	A. Bauer	B230	Various communications regarding amount of funds to be released upon entry of Court order (.2); call with J. Fullmer (.1).	0.3
09/26/19	J. Fullmer	B230	Attention to cash collateral matters.	1.0
09/26/19	J. Fullmer	B230	Call with A. Bauer regarding cash collateral matters.	0.1
09/26/19	J. Fullmer	B110	Attention to schedules and statements.	3.5
09/27/19	A. Bauer	B190	Confer with W. Gray.	0.1
09/27/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral matters.	0.3
09/27/19	J. Fullmer	B230	Attention to cash collateral matters.	1.9
09/27/19	J. Fullmer	B110	Attention to schedules and statements.	0.5
09/30/19	W. Gray Jr.	B110	Review motion for extension of exclusivity.	0.4
09/30/19	J. Fullmer	B110	Call with W. Gray regarding schedules and statements.	0.1
09/30/19	J. Fullmer	B190	Legal research regarding litigation issue.	1.0
Less Discount Applied				(3,267.10)
TOTALS				63.4

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Costs Incurred by Cost Code and Timekeeper on 36173.00002
Invoice 4009953

Employee		Costs Billed
029 Express Delivery (FEDEX)		
3152	Bauer, Alison D.	\$136.24
3177	Rosehill, Phillip	\$18.92
029 Express Delivery (FEDEX) Total:		\$155.16
050 In-House Photocopying		
3152	Bauer, Alison D.	\$0.12
050 In-House Photocopying Total:		\$0.12
055 In-House B&W Printing - Outsourced		
3218	Kelly, Rachel	\$22.32
055 In-House B&W Printing - Outsourced Total:		\$22.32
101B Tabs		
3218	Kelly, Rachel	\$10.00
101B Tabs Total:		\$10.00
104 Stenographic Transcripts		
3152	Bauer, Alison D.	\$69.60
3153	Gray Jr., William F.	\$432.35
3218	Kelly, Rachel	\$326.70
104 Stenographic Transcripts Total:		\$828.65
111 Filing & Recording Fees		
2653	Fullmer, James S.	\$200.00
111 Filing & Recording Fees Total:		\$200.00
113 Outside Professional Fees		
3218	Kelly, Rachel	\$176.80
113 Outside Professional Fees Total:		\$176.80
201 Taxi Fare		
1206	Evers, Holly	\$37.34
201 Taxi Fare Total:		\$37.34
Grand Total:		\$1,430.39

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Jeffrey Lew Liddle
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Invoice # 4013461
November 21, 2019
Page 2

This Invoice is for the Period Ending: October 31, 2019

Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
10/01/19	J. Fullmer	B110		Attention to schedules and statements.	1.0
10/01/19	M. Parkinson	B160		Review and comment on EisnerAmper fee statements and provide notice information re same (.5); discuss status of Foley statements with R. Kelly (.3).	0.8
10/01/19	J. Teoh	B190		Drafted motion to further exclusivity deadline and notice of motion.	2.8
10/01/19	R. Kelly	B110		Revise agenda and prepare binder of case status documents for W. Gray	1.0
10/01/19	R. Kelly	B160		Emails with M. Parkinson and J. Distasio re billing entries	0.3
10/01/19	R. Kelly	B110		Update calendar and schedule team meeting	0.1
10/03/19	A. Bauer	B110		Foley Hoag team meeting regarding various issues.	0.2
10/03/19	A. Bauer	B190		Review and revise motion to extend exclusivity and emails to J. Teoh re same.	0.6
10/03/19	W. Gray Jr.	B110		Team meeting re ongoing litigation and case administration matters.	0.2
10/03/19	M. Licker	B110		Attend team strategy meeting.	0.2
10/03/19	J. Fullmer	B110		Attend team meeting on case status.	0.2
10/03/19	M. Parkinson	B110		Attend team planning meeting	0.2
10/03/19	J. Teoh	B110		Conference with W Gray, A Bauer, M Licker, M Parkinson, J Fullmer and R Kelly to discuss ongoing issues regarding case administration.	0.2

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Jeffrey Lew Liddle
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This Invoice is for the Period Ending: October 31, 2019

10/03/19	R. Kelly	B110	Update meeting agenda and circulate (.3); Team meeting re case status (.2)	0.5
10/04/19	A. Bauer	B110	Review and revise notice and motion to extend exclusivity and emails to client, W. Gray and R. Kelly re same.	0.9
10/04/19	J. Fullmer	B190	Call with W. Gray regarding litigation issue.	0.1
10/06/19	J. Fullmer	B190	Legal research regarding litigation issue.	1.1
10/07/19	A. Bauer	B110	Follow up on exclusivity pleadings.	0.2
10/07/19	A. Bauer	B160	Review monthly fee statements prior to filing.	0.2
10/07/19	J. Fullmer	B190	Legal research regarding litigation issue.	2.6
10/07/19	M. Parkinson	B160	Coordinate filing of EisnerAmper fee statements.	0.2
10/07/19	J. Teoh	B110	Conference with J Liddle about edits to the Motion to Further Extend Exclusivity Period.	0.6
10/07/19	R. Kelly	B190	Revise and file motion to extend exclusivity	0.7
10/08/19	A. Bauer	B110	Discuss hearing dates with W. Gray (.1); review and revise notice of adjournment and discuss same with R. Kelly (.1).	0.2
10/08/19	A. Bauer	B110	Attention to pleadings filed in case including notice of appeal.	0.2
10/08/19	J. Fullmer	B190	Calls with W. Gray regarding litigation issues.	0.3
10/08/19	J. Teoh	B190	Researched whether debtor's counsel will need to disclose engagement of a majority owner of an unsecured creditor.	1.9
10/08/19	J. Teoh	B160	Drafted Gray Supplemental Declaration disclosing representation of majority owner of unsecured creditor.	1.6

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This Invoice is for the Period Ending: October 31, 2019

10/08/19	R. Kelly	B110	Emails with P. Rosehill re hardcopy service of recently filed documents (.2); review of docket re pending/outstanding motions and emails with W. Gray re same (.5); prepare motion tracking spreadsheet (.3); confer with A. Bauer re adjournment (.1)	1.1
10/08/19	R. Kelly	B190	Draft adjournment of Michael Barr Motion to Lift Stay and circulate to M. Licker, W. Gray, and A. Bauer; finalize and file to docket; call to chambers and emails to opposing counsel re same; prepare and send service email.	1.0
10/09/19	J. Fullmer	B185	Call with W. Gray regarding lease issue.	0.1
10/09/19	J. Fullmer	B185	Attention to lease issue.	0.2
10/09/19	J. Fullmer	B190	Call with M. Parkinson regarding litigation issue.	0.2
10/09/19	J. Fullmer	B190	Legal research regarding litigation issue.	2.7
10/09/19	J. Fullmer	B190	Call with W. Gray regarding litigation issue.	0.1
10/09/19	J. Fullmer	B110	Attention to case administration matters.	0.1
10/09/19	J. Teoh	B160	Revised Gray Supplemental Declaration and prepared for filing.	0.2
10/10/19	W. Gray Jr.	B160	Work on Torys fee application, confer with Chris Caparelli re same.	0.6
10/10/19	J. Fullmer	B110	Attention to case administration matters.	0.1
10/10/19	J. Fullmer	B190	Call with M. Parkinson regarding litigation issue.	0.1
10/10/19	J. Fullmer	B190	Legal research regarding litigation issue.	0.5
10/11/19	J. Fullmer	B110	Attention to schedules and statements.	0.1

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Jeffrey Lew Liddle
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This Invoice is for the Period Ending: October 31, 2019

10/11/19	J. Fullmer	B185	Electronic correspondence with creditor regarding lease issue.	0.4
10/15/19	J. Fullmer	B110	Attention to case administration matters.	1.4
10/15/19	R. Kelly	B190	Prepare notice of hearing re Counsel Financial 2004 motion; circulate drafts; confer with A. Bauer re revisions; finalize and file to docket.	1.5
10/16/19	A. Bauer	B110	Team meeting.	0.5
10/16/19	W. Gray Jr.	B110	Liddle team meeting regarding outstanding litigation matters, cash collateral and related issues in the individual debtor case.	0.5
10/16/19	M. Licker	B110	Attend team strategy meeting.	0.5
10/16/19	J. Fullmer	B110	Attend team meeting regarding case status.	0.5
10/16/19	J. Fullmer	B190	Legal research regarding litigation issue.	2.4
10/16/19	M. Parkinson	B110	Attend team meeting to discuss strategy and planning.	0.5
10/16/19	J. Teoh	B110	Team conference with W Gray, A Bauer, M Licker, M Parkinson, J Fullmer, and R Kelly.	0.5
10/16/19	R. Kelly	B190	Prepare notice of hearing re Counsel Financial 2004 motion; circulate drafts to W. Gray, M. Licker, A. Bauer, and J. Fullmer; finalize notice of hearing and file to docket.	0.6
10/16/19	R. Kelly	B110	Prepare agenda for meeting and circulate to team (.5); attend team meeting re status of case (.5)	1.0
10/16/19	R. Kelly	B190	Prepare notice of hearing re LIG Capital 2004 motion and circulate drafts to team	0.3
10/17/19	J. Fullmer	B190	Call with W. Gray regarding litigation issues.	0.5

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This Invoice is for the Period Ending: October 31, 2019

10/17/19	J. Fullmer	B110	Attention to schedules and statements (1.1); emails with R. Kelly re case status (.3).	1.4
10/17/19	J. Fullmer	B190	Legal research regarding litigation issues.	1.9
10/17/19	R. Kelly	B190	Finalize, circulate, and file notice of hearing re LIG Capital 2004 motion	0.5
10/17/19	R. Kelly	B110	Emails with J. Fullmer re case management (.3); draft and circulate certificate of service of recent filings (.7).	1.0
10/18/19	J. Fullmer	B110	Attention to schedules and statements.	0.6
10/18/19	J. Fullmer	B110	Call with A. Bauer regarding case administration matters.	0.4
10/18/19	J. Fullmer	B110	Attention to case administration matters.	1.0
10/18/19	R. Kelly	B110	Confer with P. Rosehill to confirm service dates (.3); finalize and file certificate of service (.3)	0.6
10/18/19	R. Kelly	B110	Draft and circulate notice of appearance re M. Licker	0.5
10/18/19	R. Kelly	B110	Draft agenda for 10/24 omnibus hearing; emails with team re same.	0.2
10/19/19	J. Fullmer	B110	Attention to schedules and statements.	1.3
10/20/19	J. Fullmer	B110	Attention to schedules and statements.	5.6
10/21/19	A. Bauer	B110	Analysis of issues regarding amended schedules (.7); call with M. Parkinson (.1).	0.8
10/21/19	J. Fullmer	B110	Attention to schedules and statements.	4.1
10/21/19	J. Fullmer	B110	Call with A. Bauer regarding case administration matters.	0.1
10/21/19	J. Fullmer	B110	Call with M. Parkinson regarding case administration matters.	0.2

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This Invoice is for the Period Ending: October 31, 2019

10/21/19	R. Kelly	B110	Draft and circulate agenda for 10/24 omnibus hearing	1.2
10/22/19	A. Bauer	B110	Emails to and from D. Wander and FH team re hearing dates and filings (.1); revision of agenda (.2).	0.3
10/22/19	J. Fullmer	B110	Attention to schedules and statements.	0.1
10/22/19	M. Parkinson	B160	Review and comment on EisnerAmper fee statement.	0.3
10/22/19	R. Kelly	B110	Revise agenda per emails with A. Bauer and M. Parkinson; Finalize and file to docket	2.0
10/22/19	R. Kelly	B160	Finalize and file notice of appearance of M. Licker	0.2
10/23/19	J. Fullmer	B110	Attention to schedules and statements.	0.3
10/23/19	J. Fullmer	B190	Attention to litigation issue.	2.0
10/23/19	J. Fullmer	B190	Call with A. Bauer regarding litigation issue.	0.1
10/23/19	M. Parkinson	B110	Preparation for 10/24 omnibus hearing.	2.0
10/23/19	R. Kelly	B110	Prepare index and prep documents for omnibus hearing binder	1.5
10/23/19	R. Kelly	B110	Emails with M. Licker and A. Bauer re 2004 Motion reply brief; finalize and file to docket; revise agenda and filed Amended Agenda to docket; prepare hardcopies to bring to court; draft certificates of service for recent filings.	1.0
10/24/19	J. Fullmer	B190	Attention to litigation matters.	0.9
10/24/19	R. Kelly	B190	Review appeal designations; confirm receipt of transcripts designated; review Local Rules and FRBP re appeals	1.2

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This Invoice is for the Period Ending: October 31, 2019

10/24/19	R. Kelly	B160	Review remaining time entries; emails with Billing Dep't, Data team, and P. Rosehill re same; revise monthly fee statemets for April, May, June, July, and August; confirm revisions with A. Bauer.	1.7
10/25/19	J. Fullmer	B190	Attention to litigation matters.	0.2
10/25/19	J. Fullmer	B190	Call with A. Bauer regarding litigation matters.	0.2
10/25/19	R. Kelly	B140	Emails with M. Parkinson, C. Nigro, C. Escher, and A. Bauer re real estate title search (.3); research re title search and calls to prospective vendors (.4)	0.7
10/25/19	R. Kelly	B160	Work on monthly fee statements; review backup data and add to fee statements; emails with B. Frerichs re same; review with A. Bauer.	4.0
10/25/19	R. Kelly	B160	File and serve EisnerAmper monthly fee statement to docket	0.3
10/25/19	R. Kelly	B110	Update internal calendar per new deadlines	0.2
10/26/19	J. Fullmer	B190	Attention to litigation issue.	0.3
10/27/19	J. Fullmer	B190	Attention to litigation issue.	0.6
10/28/19	A. Bauer	B160	Review of fee application materials.	0.6
10/28/19	A. Bauer	B190	Review and analysis of research on claim on firm assets and guarantee thereof.	0.6
10/28/19	W. Gray Jr.	B190	Review Tara Liddle motion to dismiss counterclaim, particularly argument that counterclaim is property of the estate and Counsel Financial lacks standing.	0.6
10/28/19	J. Fullmer	B190	Attention to litigation matters.	0.8
10/28/19	J. Fullmer	B190	Call with W. Gray regarding litigation issue.	0.1

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Jeffrey Lew Liddle
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This Invoice is for the Period Ending: October 31, 2019

10/28/19	R. Kelly	B160	Continue work on monthly fee statements; emails with B. Frerichs re back up data; discussions with A. Bauer re same	3.6
10/28/19	R. Kelly	B110	Emails with team re December omnibus hearing	0.1
10/28/19	R. Kelly	B190	Further research re appeals process; draft outline of process; emails with J. Fullmer re same	1.2
10/29/19	A. Bauer	B190	Attention to appeal by CF including review of statement of issues and designation and draft cross designation of items (1.0).	1.0
10/29/19	A. Bauer	B160	Review FoleyHoag monthly statements for May- August.	1.4
10/29/19	A. Bauer	B160	Confer with R. Kelly on May fee statement.	0.4
10/29/19	J. Fullmer	B190	Call with W. Gray regarding litigation issue.	0.1
10/29/19	R. Kelly	B110	Prepare agenda in advance of team meeting	0.7
10/29/19	R. Kelly	B160	Meeting with A. Bauer re further revisions	0.4
10/30/19	J. Fullmer	B110	Attention to schedules and statements.	0.2
10/30/19	M. Parkinson	B140	Correspondence with counsel to M&T re sale process for Hamptons property.	0.1
10/30/19	R. Kelly	B160	Further revisions to billing entries per A. Bauer	1.0
10/30/19	R. Kelly	B190	NY Dep't of State research and calls; confer with A. Bauer; prepare request letter to obtain law firm creation documents.	1.1
10/30/19	R. Kelly	B110	Emails with M. Parkinson and A. Bauer re title search; calls and emails with title search vendor re same.	0.4
10/30/19	R. Kelly	B110	Retrieve and circulate orders entered on docket	0.2

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Jeffrey Lew Liddle
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This Invoice is for the Period Ending: October 31, 2019

10/31/19	A. Bauer	B110	Emails re property lien search.	0.1
10/31/19	A. Bauer	B160	Attention to need for supplemental affidavit for rate adjustments.	0.2
10/31/19	A. Bauer	B110	Attention to omnibus hearing date, review of draft pleadings and other scheduling matters.	0.1
10/31/19	J. Fullmer	B185	Attention to lease issue.	0.1
10/31/19	J. Fullmer	B110	Attention to case administration matters.	0.2
10/31/19	J. Fullmer	B190	Attention to litigation matters.	0.1
10/31/19	R. Kelly	B140	Emails with A. Bauer, M. Parkinson, and CSC Global re real estate title search	0.3
10/31/19	R. Kelly	B110	Call to chambers re December omnibus hearing; enter hearing date on calendar and circulate to team; prepare and file notice of hearing; emails with A. Bauer and M. Parkinson re same.	0.5

Less Discount Applied

(4,652.55)

TOTALS

95.0

Pg 119 of 122
Foley Hoag LLPCosts Incurred by Cost Code and Timekeeper on 36173.00002
Invoice 4013461

Employee		Costs Billed
029 Express Delivery (FEDEX)		
3152	Bauer, Alison D.	\$141.58
3218	Kelly, Rachel	\$34.45
029 Express Delivery (FEDEX) Total:		\$176.03
050 In-House Photocopying		
3232	Teoh, Jiun-Wen Bob	\$4.32
050 In-House Photocopying Total:		\$4.32
055 In-House B&W Printing - Outsourced		
3218	Kelly, Rachel	\$73.32
055 In-House B&W Printing - Outsourced Total:		\$73.32
101B Tabs		
3218	Kelly, Rachel	\$13.60
101B Tabs Total:		\$13.60
101G Document Production 1-999		
3218	Kelly, Rachel	\$39.36
101G Document Production 1-999 Total:		\$39.36
122 Secretarial Overtime		
3153	Gray Jr., William F.	\$570.00
122 Secretarial Overtime Total:		\$570.00
206 Meals		
3218	Kelly, Rachel	\$0.00
3128	Rodriguez, May	\$0.00
3177	Rosehill, Phillip	\$0.00
206 Meals Total:		\$0.00
Grand Total:		\$876.63

EXHIBIT D

CERTIFICATION

Alison D. Bauer
William F. Gray, Jr.
FOLEY HOAG LLP
1301 Avenue of the Americas
25th Floor
New York, New York 10019
Tel: (646) 927-5500
Fax: (646) 927-5599

Michael Licker
Meredith Parkinson
FOLEY HOAG LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
Tel: (617) 832-1000
Fax: (617) 832-7000

Attorneys for Jeffrey Lew Liddle Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
	: Chapter 11
In re	:
	: Case No. 19-10747 (SHL)
JEFFREY LEW LIDDLE,	:
	: Jointly Administered with 19-12346 (SHL)
Debtor	:
-----	X

**CERTIFICATION OF WILLIAM F. GRAY, JR. PURSUANT TO FEE
GUIDELINES FOR FEES AND DISBURSEMENTS IN SOUTHERN
DISTRICT OF NEW YORK BANKRUPTCY CASES**

I, **WILLIAM F. GRAY, JR.**, certify, as follows:

1. I am an attorney duly admitted to practice law in the State of New York and have entered an appearance in the above-captioned cases. I am a partner in the law firm of Foley Hoag LLP ("Foley Hoag"). I submit this certification with respect to the First Interim Application for Compensation and Reimbursement of Expenses for the Period from April 27, 2019 through and including October 31, 2019 (the "Application").

2. I make this certification in accordance with the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* pursuant to General Order M-447 (Jan. 29, 2013) (the "Local Guidelines"), the *Amended Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals*, dated

November 25, 2009 (the “UST Guidelines”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 166] (the “Interim Compensation Order,” and collectively with the Local Guidelines and UST Guidelines, the “Fee Guidelines”).

3. In connection therewith, I hereby certify that:

(a) I have read the Application and, to the best of my knowledge, information and belief, formed after reasonable inquiry, the Application complies with the Fee Guidelines;

(b) To the best of my knowledge, information and belief, formed after reasonable inquiry, the fees and disbursements sought in the Application fall within the Fee Guidelines, except as specifically noted in this certification and/or in the Application;

(c) To the best of my knowledge, information and belief formed after reasonable inquiry, except as set forth in the Application, the fees and disbursements sought are billed at rates in accordance with practices customarily employed by Foley Hoag and generally accepted by Foley Hoag’s clients; and

(d) To the best of my knowledge, information and belief, formed after reasonable inquiry, and except as otherwise stated in the Application, in providing reimbursable services: Foley Hoag does not make a profit on those services; in charging for a particular service, Foley Hoag does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment or capital outlay; in seeking reimbursement for services which Foley Hoag justifiably purchased or contracted from a third party, Foley Hoag seeks reimbursement only for the amount paid by Foley Hoag to such vendors.

4. Pursuant to section B(3) of the Local Guidelines, I certify that the Debtor has been provided with a copy of the Application at least fourteen (14) days before the date set by the Court for the hearing on the Application.

Dated: December 5, 2019
New York, New York

/s/ William F. Gray, Jr.
WILLIAM F. GRAY, JR.